

**UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF
TEXAS, DALLAS DIVISION**

In Re: Highland Capital Management, L.P § Case No. 19-34054-SGJ-11

Highland Capital Management Fund Advisors, L.P.

et al §

Appellant §

VS. §

Highland Capital Management, L.P.,

§ 3:21-CV-00538-N

Appellee §

[1943] Order confirming the fifth amended chapter 11 plan, Entered on 2/22/2021.

**APPELLANT RECORD
VOLUME 11**

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ATTORNEYS FOR HIGHLAND CAPITAL
MANAGEMENT FUND ADVISORS, L.P. AND
NEXPOINT ADVISORS, L.P.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.

Debtor.

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) Chapter 11
)
)
) Case No. 19-34054 (SGJ11)
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**AMENDED DESIGNATION BY NEXPOINT ADVISORS, L.P. AND HIGHLAND
CAPITAL MANAGEMENT FUND ADVISORS, L.P.
OF ITEMS FOR THE RECORD ON APPEAL**

COME NOW Highland Capital Management Fund Advisors, L.P. and NexPoint Advisors, L.P. (the "Appellants"), creditors and parties-in-interest in the above styled and numbered bankruptcy case (the "Bankruptcy Case") of Highland Capital Management, L.P. (the "Debtor"), and, with respect to their *Notice of Appeal* [docket no. 1957], hereby file their *Amended Designation of Items for the Record on Appeal* (the "Designation") as follows:

Item	Bankruptcy Docket Number	Description
Pleadings and Items on Docket		
Vol. 1 000001	1 1957	Notice of Appeal
	2 1943	Order (i) Confirming the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified) and (ii) Granting Related Relief
000165 000326	3	Docket Sheet of Bankruptcy Case No. 19-34054
Vol. 2 000639	4 1606	Debtor's Notice of Filing of Plan Supplement for the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.
	5 1648	Notice of (I) Executory Contracts and Unexpired Leases to be Assumed by the Debtor Pursuant to the Fifth Amended Plan, (II) Cure Amounts, if Any, and (III) Related Procedures in Connection Therewith
000666	6 1656	Debtor's Notice of Filing of Plan Supplement for the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.
000675	7 1670	Objection to Confirmation of Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.
000820	8 1719	Second Notice of (I) Executory Contracts and Unexpired Leases to be Assumed by the Debtor Pursuant to the Fifth Amended Plan, (II) Cure Amounts, if Any, and (III) Related Procedures in Connection Therewith
000870	9 1749	Third Notice of (I) Executory Contracts and Unexpired Leases to be Assumed by the Debtor Pursuant to the Fifth Amended Plan, (II) Cure Amounts, if Any, and (III) Related Procedures in Connection Therewith
Vol. 3 000880	10 1772	Certification of Patrick M. Leathem With Respect to the Tabulation of Votes on the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.
000886	11 1791	Notice of Withdrawal of Certain Executory Contracts and Unexpired Leases from List of Executory Contracts and Unexpired Leases to be Assumed by the Debtor Pursuant to the Fifth Amended Plan
000901	12 1807	Debtor's Omnibus Reply to Objections to Confirmation of the Fifth Amended Chapter 11 Plan of Reorganization of Highland Capital Management
000906	13 1808	Debtor's Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified)
001031	14 1811	Notice of Filing Plan Supplement to the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (with Technical Modifications)
Vol. 4 001097	15 1814	Debtor's Memorandum of Law in Support of Confirmation of the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.
Vol. 5 001346		

Vol 5	16	1847	Fourth Notice of (I) Executory Contracts and Unexpired Leases to be Assumed by the Debtor Pursuant to the Fifth Amended Plan, (II) Cure Amounts, if Any, and (III) Related Procedures in Connection Therewith
001414	17	1873	Fifth Notice of (I) Executory Contracts and Unexpired Leases to be Assumed by the Debtor Pursuant to the Fifth Amended Plan, (II) Cure Amounts, if Any, and (III) Related Procedures in Connection Therewith
001421	18	1875	Debtor's Notice of Filing of Plan Supplement to the Fifth Amended Plan of Reorganization of Highland of Highland Capital Management, L.P. (As Modified)
001427	19	1887	Supplemental Certification of Patrick M. Leathem With Respect to the Tabulation of Votes on the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.
001475	20	1671	United States Trustee's Limited Objection to Confirmation of Debtors' Fifth Amended Plan of Reorganization
001482	Evidence and Transcripts		
001488	21	1894	Transcript of February 2, 2021 Confirmation Hearing
001783	22	1905	Transcript of February 3, 2021 Confirmation Hearing
002040	23	1917	Transcript of February 8, 2021 Bench Ruling
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RESPECTFULLY SUBMITTED this 22d day of March, 2021.

MUNSCH HARDT KOPF & HARR, P.C.

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**ATTORNEYS FOR HIGHLAND CAPITAL
MANAGEMENT FUND ADVISORS, L.P. AND
NEXPOINT ADVISORS, L.P.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 22d day of March, 2021, true and correct copies of this document were electronically served by the Court's ECF system on parties entitled to notice thereof, including on counsel for the Debtor.

By: /s/ Davor Rukavina
Davor Rukavina, Esq.

ARTICLE III.
THE LITIGATION TRUSTEE

3.1 Role. In furtherance of and consistent with the purpose of the Litigation Sub-Trust, the Plan, and this Agreement, the Litigation Trustee, subject to the terms and conditions contained herein, in the Plan, and in the Confirmation Order, shall serve as Litigation Trustee with respect to the Litigation Sub-Trust Assets for the benefit of the Litigation Sub-Trust Beneficiary and maintain, manage, and take action on behalf of the Litigation Sub-Trust.

3.2 Authority.

(a) In connection with the administration of the Litigation Sub-Trust, in addition to any and all of the powers enumerated elsewhere herein, the Litigation Trustee shall, in an expeditious but orderly manner, investigate, prosecute, settle, and otherwise resolve the Estate Claims. The Litigation Trustee shall have the power and authority and is authorized to perform any and all acts necessary and desirable to accomplish the purposes of this Agreement and the provisions of the Plan and the Confirmation Order relating to the Litigation Sub-Trust, within the bounds of this Agreement, the Plan, the Confirmation Order, and applicable law.

(b) The Litigation Trustee, subject to the limitations set forth in Section 3.3 of this Agreement shall have the right to prosecute, defend, compromise, adjust, arbitrate, abandon, estimate, or otherwise deal with and settle any and all Estate Claims and Employee Claims (in accordance with the terms of the Claimant Trust Agreement). To the extent that any action has been taken to prosecute, defend, compromise, adjust, arbitrate, abandon, or otherwise deal with and settle any such Estate Claims or Employee Claims prior to the Effective Date, on the Effective Date the Litigation Trustee shall be substituted for the Debtor in connection therewith in accordance with Rule 25 of the Federal Rules of Civil Procedure, made applicable by Rule 7025 of the Federal Rules of Bankruptcy Procedure, and the caption with respect to such pending action shall be changed to the following “Marc Kirschner, not individually but solely as Litigation Trustee for the Highland Litigation Sub-Trust, et al. v. [Defendant]”.

(c) Subject in all cases to any limitations contained herein, in the Confirmation Order, or in the Plan, the Litigation Trustee shall have the power and authority to:

(i) hold legal title to any and all rights in or arising from the Litigation Sub-Trust Assets, including, but not limited to, the right to collect any and all money and other property belonging to the Litigation Sub-Trust (including any proceeds of the Litigation Sub-Trust Assets);

(ii) perform the duties, exercise the powers, and asserts the rights of a trustee under sections 1123(b)(3)(B) of the Bankruptcy Code with respect to the Litigation Sub-Trust Assets, including the right to assert claims, defenses, offsets, and privileges;

(iii) subject to any approval of the Oversight Board that may be required under Section 3.3(b), protect and enforce the rights of the Litigation Sub-Trust with respect to any Litigation Sub-Trust Assets by any method deemed appropriate, including, without

limitation, by judicial proceeds, or pursuant to any applicable bankruptcy, insolvency, moratorium, or similar law and general principles of equity;

(iv) determine and satisfy any and all liabilities created, incurred, or assumed by the Litigation Sub-Trust;

(v) subject to any approval of the Oversight Board that may be required under Section 3.3(b), investigate, analyze, compromise, adjust, arbitrate, mediate, sue on or defend, prosecute, abandon, dismiss, exercise rights, powers and privileges with respect to or otherwise deal with and settle, in accordance with the terms set forth in this Agreement, all Estate Claims, Employee Claims, or any other Causes of Action in favor of or against the Litigation Sub-Trust;

(vi) with respect to any Estate Claim, avoid and recover transfers of the Debtor's property as may be permitted by the Bankruptcy Code or applicable state law;

(vii) subject to applicable law, seek the examination of any Entity or Person with respect to the Estate Claims;

(viii) make all payments relating to the Litigation Sub-Trust Assets;

(ix) assess, enforce, release, or waive any privilege or defense on behalf of the Litigation Sub-Trust, the Litigation Sub-Trust Assets, or the Litigation Sub-Trust Beneficiary, if applicable;

(x) prepare, or have prepared, and file, if necessary, with the appropriate taxing authority any and all tax returns, information returns, and other required documents with respect to the Litigation Sub-Trust, and pay taxes properly payable by the Litigation Sub-Trust;

(xi) if not otherwise covered by insurance coverage obtained by the Claimant Trust, obtain reasonable insurance coverage with respect to any liabilities and obligations of the Litigation Trustee, solely in his capacity as such, in the form of fiduciary liability insurance, a directors and officers policy, an errors and omissions policy, or otherwise. The cost of any such insurance shall be a Litigation Sub-Trust Expense and paid by the Litigation Trustee from the Litigation Sub-Trust Expense Reserve;

(xii) without further order of the Bankruptcy Court, but subject to the terms of this Agreement, employ various consultants, third-party service providers, and other professionals, including counsel, tax advisors, consultants, brokers, investment bankers, valuation counselors, and financial advisors, as the Litigation Trustee deems necessary to aid him in fulfilling his obligations under this Agreement; such consultants, third-party service providers, and other professionals shall be retained pursuant to whatever fee arrangement the Litigation Trustee deems appropriate, including contingency fee arrangements and any fees and expenses incurred by such professionals engaged by the Litigation Trustee shall be Litigation Sub-Trust Expenses and paid by the Litigation Trustee from the Litigation Sub-Trust Expense Cash Reserve;

(xiii) to the extent applicable, assert, enforce, release, or waive any Privilege or defense on behalf of the Litigation Sub-Trust (including as to any Privilege that the Debtor held prior to the Effective Date), including to provide any information to insurance carriers that the Litigation Trustee deems necessary to utilize applicable insurance coverage for any Claim or Claims;

(xiv) take all steps and execute all instruments and documents necessary to effectuate the purpose of the Litigation Sub-Trust and the activities contemplated herein and in the Confirmation Order and the Plan, and take all actions necessary to comply with the Confirmation Order, the Plan, and this Agreement and the obligations thereunder and hereunder; and

(xv) exercise such other powers and authority as may be vested in or assumed by the Litigation Trustee by any Final Order (the foregoing subparagraphs (i)-(xv) being collectively, the “Authorized Acts”).

(d) The Litigation Trustee has the power and authority to act as trustee of the Litigation Sub-Trust and perform the Authorized Acts through the date such Litigation Trustee resigns, is removed, or is otherwise unable to serve for any reason.

(e) Any determinations by the Liquidation Trustee, under the direction of the Oversight Board, with respect to the amount or timing of settlement or other disposition of any Estate Claims settled in accordance with the terms of this Agreement shall be conclusive and binding on the Litigation Sub-Trust Beneficiary and all other parties of interest following the entry of an order of a court of competent jurisdiction approving such settlement or other disposition to the extent required or obtained.

3.3 Limitation of Authority.

(a) Notwithstanding anything herein to the contrary, the Litigation Sub-Trust and the Litigation Trustee shall not (i) be authorized to engage in any trade or business, (ii) take any actions inconsistent with the management of the Estate Claims as required or contemplated by applicable law, the Confirmation Order, the Plan, and this Agreement, or (iii) take any action in contravention of the Confirmation Order, the Plan, or this Agreement.

(b) Notwithstanding anything herein to the contrary, and in no way limiting the terms of the Plan, the Litigation Trustee must receive the consent by vote of a [simple majority] of the Oversight Board pursuant to the notice and quorum requirements set forth in Section 4.5 of the Claimant Trust Agreement, in order to:

(i) terminate or extend the term of the Litigation Sub-Trust;

(ii) commence litigation with respect to any Estate Claims and, if applicable under the terms of the Claimant Trust Agreement, the Employee Claims, including, without limitation, to (x) litigate, resolve, or settle coverage and/or the liability of any insurer under any insurance policy or legal action related thereto, or (y) pursue avoidance, recovery, or similar remedies that may be brought under chapter 5 of the Bankruptcy Code or under similar or related state or federal statutes or common law, including fraudulent transfer law;

(iii) settle, dispose of, or abandon any Estate Claims (including any counterclaims to the extent such counterclaims are set off against the proceeds of any such Estate Claim);

(iv) borrow funds as may be necessary to fund litigation or other costs of the Litigation Sub-Trust;

(v) reserve or retain any cash or cash equivalents in the Litigation Sub-Trust Cash Reserve in an amount reasonably necessary to meet claims and contingent liabilities;

(vi) change the compensation of the Litigation Trustee; and

(vii) retain counsel, experts, advisors, or any other professionals.

(c) [Reserved]

3.4 Binding Nature of Actions. All actions taken and determinations made by the Litigation Trustee in accordance with the provisions of this Agreement shall be final and binding upon the Litigation Sub-Trust Beneficiary.

3.5 Term of Service. The Litigation Trustee shall serve as the Litigation Trustee for the duration of the Litigation Sub-Trust, subject to death, resignation or removal.

3.6 Resignation. The Litigation Trustee may resign as trustee of the Litigation Sub-Trust by an instrument in writing delivered to the Bankruptcy Court and Oversight Board at least thirty (30) days before the proposed effective date of resignation. The Litigation Trustee shall continue to serve as Litigation Trustee after delivery of the Litigation Trustee's resignation until the proposed effective date of such resignation, unless the Litigation Trustee and a [simple majority] of the Oversight Board consent to an earlier effective date, which earlier effective date shall be no earlier than the date of appointment of a successor Litigation Trustee in accordance with Section 3.8 hereof becomes effective.

3.7 Removal.

(a) The Litigation Trustee may be removed by a [simple majority] vote of the Oversight Board for Cause, immediately upon notice thereof, or without Cause, upon [60 days'] prior written notice.

(b) To the extent there is any dispute regarding the removal of a Litigation Trustee (including any dispute relating to any compensation or expense reimbursement due under this Agreement) the Bankruptcy Court shall retain jurisdiction to consider and adjudicate such dispute. Notwithstanding the foregoing, the Litigation Trustee will continue to serve as the Litigation Trustee after his removal until the earlier of (i) the time when a successor Litigation Trustee will become effective in accordance with Section 3.8 of this Agreement or (ii) such date as the Bankruptcy Court otherwise orders.

3.8 Appointment of Successor.

(a) Appointment of Successor. In the event of a vacancy by reason of the death, Disability, or removal of the Litigation Trustee, or prospective vacancy by reason of resignation, a successor Litigation Trustee shall be selected by a [simple majority] vote of the Oversight Board. If Members of the Oversight Board are unable to secure a majority vote, the Bankruptcy Court will determine the successor Litigation Trustee on motion of the Members. If a final decree has been entered closing the Chapter 11 Case, the Litigation Trustee may seek to reopen the Chapter 11 Case for the limited purpose of determining the successor Litigation Trustee, and the costs for such motion and costs related to re-opening the Chapter 11 Case shall be paid by the Litigation Sub-Trust, or the Claimant Trust on behalf of the Litigation Sub-Trust. The successor Litigation Trustee shall be appointed as soon as practicable, but in any event no later than sixty (60) days after the occurrence of the vacancy or, in the case of resignation, on the effective date of the resignation of the then acting Litigation Trustee.

(b) Vesting or Rights in Successor Litigation Trustee. Every successor Litigation Trustee appointed hereunder shall execute, acknowledge, and deliver to the Litigation Sub-Trust, the Claimant Trustee, the exiting Litigation Trustee, the Oversight Board, and file with the Bankruptcy Court, an instrument accepting such appointment subject to the terms and provisions hereof. The successor Litigation Trustee, without any further act, deed, or conveyance shall become vested with all the rights, powers, trusts and duties of the exiting Litigation Trustee except that the successor Litigation Trustee shall not be liable for the acts or omissions of the retiring Litigation Trustee. In no event shall the retiring Litigation Trustee be liable for the acts or omissions of the successor Litigation Trustee.

(c) Interim Litigation Trustee. During any period in which there is a vacancy in the position of Litigation Trustee, the Oversight Board shall appoint one of its Members or the Claimant Trustee to serve as the interim Litigation Trustee (the “Interim Trustee”) until a successor Litigation Trustee is appointed pursuant to Section 3.8(a). The Interim Trustee shall be subject to all the terms and conditions applicable to a Litigation Trustee hereunder. Such Interim Trustee shall not be limited in any manner from exercising any rights or powers as a Member of the Oversight Board or Claimant Trustee, as applicable, merely by such Person’s appointment as Interim Trustee.

3.9 Continuance of Litigation Sub-Trust. The death, resignation, or removal of the Litigation Trustee shall not operate to terminate the Litigation Sub-Trust created by this Agreement or to revoke any existing agency (other than any agency of the Litigation Trustee as the Litigation Trustee) created pursuant to the terms of this Agreement or invalidate any action taken by the Litigation Trustee. In the event of the resignation or removal of the Litigation Trustee, the Litigation Trustee shall promptly (i) execute and deliver, by the effective date of resignation or removal, such documents, instruments, records, and other writings as may be reasonably requested by his successor to effect termination of the exiting Litigation Trustee’s capacity under this Agreement and the conveyance of the Estate Claims then held by the exiting Litigation Trustee to the successor Litigation Trustee; (ii) deliver to the successor Litigation Trustee all non-privileged documents, instruments, records, and other writings relating to the Litigation Sub-Trust as may be in the possession or under the control of the exiting Litigation Trustee, provided, the exiting Litigation Trustee shall have the right to make and retain copies of

such documents, instruments, records and other writings delivered to the successor Litigation Trustee and the cost of making such copies shall be a Litigation Sub-Trust Expense to be paid by the Litigation Sub-Trust; and (iii) otherwise assist and cooperate in effecting the assumption of the exiting Litigation Trustee's obligations and functions by his successor, provided the fees and expenses of such assistance and cooperation shall be paid to the exiting Litigation Trustee by the Litigation Sub-Trust. The exiting Litigation Trustee shall irrevocably appoint the successor Litigation Trustee as his attorney-in-fact and agent with full power of substitution for it and its name, place and stead to do any and all acts that such exiting Litigation Trustee is obligated to perform under this Section 3.9.

3.10 Litigation Trustee as "Estate Representative". The Litigation Trustee will be the exclusive trustee of the Litigation Sub-Trust Assets, for purposes of 31 U.S.C. § 3713(b) and 26 U.S.C. § 6012(b)(3), as well as the representative of the Estate appointed pursuant to section 1123(b)(3)(B) of the Bankruptcy Code (the "Estate Representative") with respect to the Estate Claims, with all rights and powers attendant thereto, in addition to all rights and powers granted in the Plan and in this Agreement. The Litigation Trustee will be the successor-in-interest to the Debtor with respect to any action pertaining to the Estate Claims, which was or could have been commenced by the Debtor prior to the Effective Date, except as otherwise provided in the Plan or Confirmation Order. All actions, claims, rights or interests constituting or relating to Estate Claims are preserved and retained and may be enforced by the Litigation Trustee as an Estate Representative.

3.11 Books and Records.

(a) The Litigation Trustee shall maintain, in respect of the Litigation Sub-Trust and the Claimant Trust, books and records pertinent to Estate Claims in its possession and the income of the Litigation Sub-Trust and payment of expenses, liabilities, and claims against or assumed by the Litigation Sub-Trust in such detail and for such period of time as may be necessary to enable it to make full and proper accounting in respect thereof. Such books and records shall be maintained as reasonably necessary to facilitate compliance with the tax reporting requirements of the Litigation Sub-Trust and the requirements of Article VII herein. Except as otherwise provided herein, nothing in this Agreement requires the Litigation Trustee to file any accounting or seek approval of any court with respect to the administration of the Litigation Sub-Trust, or as a condition for managing any payment or distribution out of the Litigation Sub-Trust. Notwithstanding the foregoing, the Litigation Trustee shall to retain such books and records, and for such periods, with respect to any Reorganized Debtor Assets as are required to be retained pursuant to Section 204-2 of the Investment Advisers Act or any other applicable laws, rules, or regulations.

(b) The Litigation Trustee may dispose some or all of the books and records maintained by the Litigation Trustee at the later of (i) such time as the Litigation Trustee determines, with the unanimous consent of the Oversight Board, that the continued possession or maintenance of such books and records is no longer necessary for the benefit of the Litigation Sub-Trust, including with respect to the Estate Claims, or (ii) upon the termination and winding up of the Litigation Sub-Trust under Article IX of this Agreement.

3.12 Reports.

(a) Financial and Status Reports. The fiscal year of the Litigation Sub-Trust shall be the calendar year. Within 90 days after the end of each calendar year during the term of the Litigation Sub-Trust, and within 45 days after the end of each calendar quarter during (other than the fourth quarter) the term of the Litigation Sub-Trust and as soon as practicable upon termination of the Litigation Sub-Trust, the Litigation Trustee shall make available upon request to the Oversight Board or Litigation Sub-Trust Beneficiary appearing on its records as of the end of such period or such date of termination, a written report including: (i) unaudited financial statements of the Litigation Sub-Trust for such period, and, if the end of a calendar year, an unaudited report (which may be prepared by an independent certified public accountant employed by the Litigation Trustee) reflecting the result of such agreed-upon procedures relating to the financial accounting administration of the Litigation Sub-Trust as proposed by the Litigation Trustee; (ii) a summary description of any action taken by the Litigation Sub-Trust that, in the judgment of the Litigation Trustee, materially affects the Litigation Sub-Trust and of which notice has not previously been given to the Oversight Board or Litigation Sub-Trust Beneficiary, provided, that any such description shall not include any privileged or confidential information of the Litigation Trustee; and (iii) a description of the progress of liquidating the Litigation Sub-Trust Assets and making distributions to the Litigation Sub-Trust Beneficiary and any other material information relating to the Litigation Sub-Trust Assets and the administration of the Litigation Sub-Trust deemed appropriate to be disclosed by the Litigation Trustee, which description shall include a written report detailing, among other things, the litigation status of the Estate Claims transferred to the Litigation Sub-Trust, any settlements entered into by the Litigation Sub-Trust with respect to the Estate Claims, the proceeds recovered to date from Estate Claims, and the distributions made by the Litigation Sub-Trust.

(b) Annual Plan and Budget. If instructed by the Oversight Board, the Litigation Trustee shall prepare and submit to the Oversight Board for approval an annual plan and budget in such detail as reasonably requested.

3.13 Compensation and Reimbursement; Engagement of Professionals.

(a) Compensation and Expenses.

(i) Compensation. As compensation for any services rendered by the Litigation Trustee in connection with this Agreement, the Litigation Trustee shall receive initial compensation in a manner and amount ~~to~~as agreed upon by the Committee. Any additional compensation or compensation of a Successor Litigation Trustee shall be determined by the Oversight Board.

(ii) Expense Reimbursements. All reasonable out-of-pocket expenses of the Litigation Trustee in the performance of his or her duties hereunder, shall be reimbursed as Litigation Sub-Trust Expenses paid by the Litigation Sub-Trust.

(b) Professionals.

(i) Engagement of Professionals. The Litigation Trustee shall engage professionals from time to time in conjunction with the services provided hereunder. The Litigation Trustee's engagement of such professionals shall be approved by a majority of the Oversight Board as set forth in Section 3.3(b) hereof.

(ii) Fees and Expenses of Professionals. The Litigation Trustee shall pay the reasonable fees and expenses of any retained professionals as Litigation Sub-Trust Expenses.

3.14 Reliance by Litigation Trustee. Except as otherwise provided herein, the Litigation Trustee may rely, and shall be fully protected in acting or refraining from acting, on any resolution, statement, certificate, instrument, opinion, report, notice, request, consent, order or other instrument or document that the Litigation Trustee has no reason to believe to be other than genuine and to have been signed or presented by the proper party or parties or, in the case of facsimiles, to have been sent by the proper party or parties, and the Litigation Trustee may conclusively rely as to the truth of the statements and correctness of the opinions or direction expressed therein. The Litigation Trustee may consult with counsel and other professionals, and any advice of such counsel or other professionals shall constitute full and complete authorization and protection in respect of any action taken or not taken by the Litigation Trustee in accordance therewith. The Litigation Trustee shall have the right at any time to seek instructions from the Bankruptcy Court, or any other court of competent jurisdiction concerning Estate Claims, this Agreement, the Plan, or any other document executed in connection therewith, and any such instructions given shall be full and complete authorization in respect of any action taken or not taken by the Litigation Trustee in accordance therewith. The Litigation Sub-Trust shall have the right to seek Orders from the Bankruptcy Court as set forth in Article IX of the Plan.

3.15 Commingling of Litigation Sub-Trust Assets. The Litigation Trustee shall not commingle any of the Litigation Sub-Trust Assets with his or her own property or the property of any other Person.

3.16 [Delaware Trustee. The Delaware Trustee shall have the power and authority, and is hereby authorized and empowered, to (i) accept legal process served on the Litigation Sub-Trust in the State of Delaware; and (ii) execute any certificates that are required to be executed under the Statutory Trust Act and file such certificates in the office of the Secretary of State of the State of Delaware, and take such action or refrain from taking such action under this Agreement as may be directed in a writing delivered to the Delaware Trustee by the Litigation Trustee; provided, however, that the Delaware Trustee shall not be required to take or to refrain from taking any such action if the Delaware Trustee shall believe, or shall have been advised by counsel, that such performance is likely to involve the Delaware Trustee in personal liability or to result in personal liability to the Delaware Trustee, or is contrary to the terms of this Agreement or of any document contemplated hereby to which the Litigation Sub-Trust or the Delaware Trustee is or becomes a party or is otherwise contrary to law. The Parties agree not to instruct the Delaware Trustee to take any action or to refrain from taking any action that is contrary to the terms of this Agreement or of any document contemplated hereby to which the Litigation Sub-Trust or the Delaware Trustee is or becomes party or that is otherwise contrary to law.

Other than as expressly provided for in this Agreement, the Delaware Trustee shall have no duty or power to take any action for or on behalf of the Litigation Sub-Trust.]

ARTICLE IV.
THE OVERSIGHT BOARD

The Oversight Board shall be governed by Article IV of the Claimant Trust Agreement.

ARTICLE V.
TRUST INTERESTS

5.1 Litigation Sub-Trust Interests. On the date hereof, the Litigation Sub-Trust shall issue Trust Interests to the Claimant Trust as the sole Litigation Sub-Trust Beneficiary. The Litigation Sub-Trust Beneficiary shall be entitled to distributions from the Litigation Sub-Trust Assets in accordance with the terms of the Plan and this Agreement.

5.2 Transferability of Trust Interests. No transfer, assignment, pledge, hypothecation, or other disposition of a Trust Interest may be effected.

5.3 Exemption from Registration. The Parties hereto intend that the rights of the Litigation Sub-Trust Beneficiary arising under this Litigation Sub-Trust shall not be “securities” under applicable laws, but none of the Parties represent or warrant that such rights shall not be securities or shall not be entitled to exemption from registration under the applicable securities laws. The Oversight Board, acting unanimously, and Litigation Trustee may amend this Agreement in accordance with Article IX hereof to make such changes as are deemed necessary or appropriate with the advice of counsel, to ensure that the Litigation Sub-Trust is not subject to registration and/or reporting requirements of the Securities Act, the Exchange Act, the TIA, or the Investment Company Act. The Trust Interests shall not have consent or voting rights or otherwise confer on the Litigation Sub-Trust Beneficiary any rights similar to the rights of a shareholder of a corporation in respect of any actions taken or to be taken, or decisions made or to be made, by the Oversight Board and/or the Litigation Trustee under this Agreement.

ARTICLE VI. DISTRIBUTIONS

6.1 Distributions. The Litigation Trustee shall distribute Cash proceeds of the Estate Claims to the Claimant Trust within ~~30 days~~ of receipt of such Cash proceeds, net of any amounts that (a) are reasonably necessary to maintain the value of the Litigation Sub-Trust Assets pending their monetization or other disposition during the term of the Litigation Sub-Trust, (b) are necessary to pay or reserve for reasonably incurred or anticipated Litigation Sub-Trust Expenses and any other expenses incurred by the Litigation Sub-Trust (including, but not limited to, any taxes imposed on or payable by the Litigation Trustee with respect to the Litigation Sub-Trust Assets), and (c) are necessary to satisfy or reserve for other liabilities incurred or anticipated by the Litigation Trustee in accordance with the Plan and this Agreement (including, but not limited to, indemnification obligations and similar expenses).

6.2 Manner of Payment or Distribution. All distributions made by the Litigation Trustee on behalf of the Litigation Sub-Trust to the Litigation Sub-Trust Beneficiary shall be payable by the Litigation Trustee directly to the Claimant Trust, as sole Litigation Sub-Trust Beneficiary, on the date scheduled for the distribution, unless such day is not a Business Day, then such date or the distribution shall be the following Business Day, but such distribution shall be deemed to have been completed as of the required date.

6.3 Delivery of Distributions. All distributions under this Agreement to the Claimant Trust shall be made pursuant to wire instructions provided by the Claimant Trustee to the Litigation Trustee.

ARTICLE VII. TAX MATTERS

7.1 Tax Treatment and Tax Returns. ~~(a) It is intended for the initial transfer of that~~ the Litigation Sub-Trust ~~Assets to the Litigation Sub-Trust to will~~ be treated as a grantor trust for federal income tax purposes (and foreign, state, and local income tax purposes where applicable) ~~as if the Debtor transferred the Litigation Sub-Trust Assets to the Litigation Sub-Trust Beneficiary and then, immediately thereafter, the Litigation Sub-Trust Beneficiary transferred the Litigation Sub-Trust Assets to the Litigation Sub-Trust~~ the sole beneficiary of which is the Claimant Trust. Consistent with such treatment, ~~(i) it is intended that the Litigation Sub-Trust will it is intended that the transfer of the Litigation Sub Trust Assets from the Claimant Trust to the Litigation Sub Trust will be treated as a non-event for federal income tax purposes (and foreign, state, and local income tax purposes where applicable). Further, because the Claimant Trust is itself intended to~~ be treated as a grantor trust for federal income tax purposes (and foreign, state, and local income tax purposes where applicable), ~~(ii) it is intended that the Litigation Sub-Trust Beneficiary~~ beneficiaries of the Claimant Trust will be treated as the grantor of the Litigation Sub-Trust and owner of the Litigation Sub-Trust Assets for federal income tax purposes (and foreign, state, and local income tax purposes where applicable), ~~and (iii) the~~ The Litigation Trustee shall ~~file all~~ cooperate with the Claimant Trustee in connection with the preparation and filing of any federal income tax returns (and foreign, state, and local income tax returns where applicable) ~~for the Litigation Sub-Trust Beneficiary as a grantor trust pursuant to Treasury Regulation Section 1.671-4(a). The Litigation Trustee also will annually send to the Litigation~~

~~Sub-Trust Beneficiary, in accordance with the tax laws, a separate statement setting forth such holder's interest in the Litigation Sub-Trust and share of items of income, gain, loss, deduction or credit as relevant for U.S. federal income tax purposes for such Litigation Sub-Trust Beneficiary to use in preparing their U.S. federal income tax returns. (b) The Litigation Trustee shall determine the fair market value of~~for information statements relating to ~~the Litigation Sub-Trust Assets as of the Effective Date and notify the Litigation Sub-Trust Beneficiary of such valuation, and such valuation shall be used consistently by all parties for all federal income tax purposes.~~
Trust Assets.

7.2 Withholding. The Litigation Trustee may withhold from any amount distributed from the Litigation Sub-Trust to the Litigation Sub-Trust Beneficiary such sum or sums as are required to be withheld under the income tax laws of the United States or of any state or political subdivision thereof. Any amounts withheld pursuant hereto shall be deemed to have been distributed to and received by the Litigation Sub-Trust Beneficiary. As a condition to receiving any distribution from the Litigation Sub-Trust, the Litigation Trustee may require that the Litigation Sub-Trust Beneficiary provide such holder's taxpayer identification number and such other information and certification as may be deemed necessary for the Litigation Trustee to comply with applicable tax reporting and withholding laws.²

ARTICLE VIII.

STANDARD OF CARE AND INDEMNIFICATION

8.1 Standard of Care. None of the Litigation Trustee, acting in his capacity as the Litigation Trustee or in any other capacity contemplated by this Agreement or the Plan, the Oversight Board, or any individual Member, solely in their capacity as Members of the Oversight Board, shall be personally liable to the Litigation Sub-Trust or to any Person (including the Litigation Sub-Trust Beneficiary and Claimant Trust Beneficiaries) in connection with the affairs of the Litigation Sub-Trust, unless it is ultimately determined by order of the Bankruptcy Court or other court of competent jurisdiction that the acts or omissions of any such Litigation Trustee, Oversight Board, or Member constituted fraud, willful misconduct, or gross negligence. The employees, agents and professionals retained by the Litigation Sub-Trust, the Litigation Trustee, or Oversight Board shall not be personally liable to the Litigation Sub-Trust or any other Person in connection with the affairs of the Litigation Sub-Trust, unless it is ultimately determined by order of the Bankruptcy Court or other court of competent jurisdiction that such acts or omissions by such employee, agent, or professional constituted willful fraud, willful misconduct or gross negligence. None of the Litigation Trustee, Oversight Board, or any Member shall be personally liable to the Litigation Sub-Trust or to any Person for the acts or omissions of any employee, agent or professional of the Litigation Sub-Trust or Litigation Trustee, unless it is ultimately determined by order of the Bankruptcy Court or other court of competent jurisdiction that the Litigation Trustee, Oversight Board, or Member acted with gross negligence or willful misconduct in the selection, retention, or supervision of such employee, agent or professional of the Litigation Sub-Trust.

8.2 Indemnification. The Litigation Trustee (including each former Litigation Trustee), Oversight Board, and all past and present Members (collectively, the "Indemnified Parties") shall be indemnified by the Litigation Sub-Trust against and held harmless by the

²~~-NTD: Subject to review by tax counsel-~~

Litigation Sub-Trust from any losses, claims, damages, liabilities or expenses (including, without limitation, attorneys' fees, disbursements, and related expenses) to which the Indemnified Parties may become subject in connection with any action, suit, proceeding or investigation brought or threatened against any of the Indemnified Parties in their capacity as Litigation Trustee, Oversight Board, or Member, or in connection with any matter arising out of or related to the Plan, this Agreement, or the affairs of the Litigation Sub-Trust, unless it is ultimately determined by order of the Bankruptcy Court or other court of competent jurisdiction that the Indemnified Party's acts or omissions constituted willful fraud, willful misconduct, or gross negligence. If the Indemnified Party becomes involved in any action, proceeding, or investigation in connection with any matter arising out of or in connection with the Plan, this Agreement or the affairs of the Litigation Sub-Trust for which an indemnification obligation could arise, the Indemnified Party shall promptly notify the Litigation Trustee and/or Oversight Board, as applicable; provided, however, that the failure of an Indemnified Party to promptly notify the Litigation Trustee and/or Oversight Board of an indemnification obligation will not excuse the Litigation Sub-Trust from indemnifying the Indemnified Party unless such delay has caused the Litigation Sub-Trust material harm. The Litigation Sub-Trust shall periodically advance or otherwise reimburse on demand the Indemnified Party's reasonable legal and other expenses (including, without limitation, the cost of any investigation and preparation and attorney fees, disbursements, and related expenses) incurred in connection therewith as a Litigation Sub-Trust Expense, but the Indemnified Party shall be required to repay promptly to the Litigation Sub-Trust the amount of any such advanced or reimbursed expenses paid to the Indemnified Party to the extent that it shall be ultimately determined by Final Order that the Indemnified Party engaged in willful fraud, misconduct, or negligence in connection with the affairs of the Litigation Sub-Trust with respect to which such expenses were paid. The Litigation Sub-Trust shall indemnify and hold harmless the employees, agents and professionals of the Litigation Sub-Trust and Indemnified Parties to the same extent as provided in this Section 8.2 for the Indemnified Parties. For the avoidance of doubt, the provisions of this Section 8.2 shall remain available to any former Litigation Trustee or Member or the estate of any decedent Litigation Trustee or Member. The indemnification provided hereby shall be a Litigation Sub-Trust Expense.

8.3 To the extent applicable, the provisions and protections set forth in Article IX of the Plan will apply to the Litigation Sub-Trust, the Litigation Trustee, Oversight Board, and the Members.

ARTICLE IX. **TERMINATION**

9.1 Duration. The Litigation Trustee, the Litigation Sub-Trust, and the Oversight Board shall be discharged or dissolved, as the case may be, at such time as the Litigation Trustee determines that the Estate Claims is not likely to yield sufficient additional proceeds to justify further pursuit of such Estate, and all Distributions required to be made by the Litigation Trustee to the Litigation Sub-Trust Beneficiary under the Plan and this Agreement have been made, but in no event shall the Litigation Sub-Trust be dissolved later than [three years] from the Effective Date unless the Bankruptcy Court, upon motion made within the six-month period before such third anniversary (and, in the event of further extension, by order of the Bankruptcy Court, upon motion made at least six months before the end of the preceding extension), determines that a fixed period extension (~~not to exceed two years, together with any prior extensions, without a~~

~~favorable letter ruling from the Internal Revenue Service or an opinion of counsel that any further extension would not adversely affect the status of the Litigation Sub-Trust as a liquidating trust for federal income tax purposes}) is necessary to facilitate or complete the recovery on, and liquidation of, the Litigation Sub-Trust Assets; provided, however, that each extension must be approved, upon a finding that the extension is necessary to facilitate or complete the recovery on, and liquidation of the Litigation Sub-Trust Assets, by the Bankruptcy Court within six months of the beginning of the extended term and no extension, together with any prior extensions, shall exceed three years [without a favorable letter ruling from the Internal Revenue Service or an opinion of counsel that any further extension would not adversely affect the status of the Litigation Sub-Trust as a liquidating trust for federal income tax purposes].~~

9.2 Continuance of the Litigation Trustee for Winding Up. After dissolution of the Litigation Sub-Trust and for purpose of liquidating and winding up the affairs of the Litigation Sub-Trust, the Litigation Trustee shall continue to act as such until the Litigation Trustee's duties have been fully performed. Prior to the final distribution of all remaining Litigation Sub-Trust Assets, the Litigation Trustee shall be entitled to reserve from such assets any and all amounts required to provide for the Litigation Trustee's own costs and expenses, including a reserve to fund any potential indemnification or similar obligations of the Litigation Sub-Trust, until such time as the winding up of the Litigation Sub-Trust is completed. Upon the dissolution of the Litigation Sub-Trust and completion of the winding up of the assets, liabilities and affairs of the Litigation Sub-Trust pursuant to the Delaware Statutory Trust Act, the Litigation Trustee shall file a certificate of cancellation with the State of Delaware to terminate the Litigation Sub-Trust pursuant to Section 3810 of the Delaware Statutory Trust Act (such date upon which the certificate of cancellation is filed shall be referred to as the "Termination Date"). Subject in all respects to 3.11, upon the Termination date, the Litigation Trustee shall retain for a period of two (2) years, as a Litigation Sub-Trust Expense, the books, records, and certificated and other documents and files that have been delivered to or created by the Litigation Trustee. Subject in all respects to Section 3.11, at the Litigation Trustee's discretion, all of such records and documents may, but need not, be destroyed at any time after two (2) years from the Termination Date.

9.3 Termination of Duties. Except as otherwise specifically provided herein, upon the Termination Date of the Litigation Sub-Trust, the Litigation Trustee, the Oversight Board, and its Members shall have no further duties or obligations hereunder.

ARTICLE X.

AMENDMENTS AND WAIVER

The Litigation Trustee, with the consent of a simple majority of the Oversight Board, may amend this Agreement to correct or clarify any non-material provisions. This Agreement may not otherwise be amended, supplemented, otherwise modified, or waived in any respect except by an instrument in writing signed by the Litigation Trustee and with the unanimous approval of the Oversight Board, and the approval of the Bankruptcy Court, after notice and a hearing; provided that the Litigation Trustee must provide the Oversight Board with prior written notice of any non-material amendments, supplements, modifications, or waivers of this Agreement.

ARTICLE XL
MISCELLANEOUS

11.1 Trust Irrevocable. Except as set forth in this Agreement, establishment of the Litigation Sub-Trust by this Agreement shall be irrevocable and shall not be subject to revocation, cancellation or rescission by the Litigation Sub-Trust Beneficiary.

11.2 Litigation Sub-Trust Beneficiary has No Legal Title to Litigation Sub-Trust Assets. The Litigation Sub-Trust Beneficiary shall have no legal title to any part of the Litigation Sub-Trust Assets.

11.3 Agreement for Benefit of Parties Only. Nothing herein, whether expressed or implied, shall be construed to give any Person other than the Litigation Trustee, Oversight Board, and the Litigation Sub-Trust Beneficiary any legal or equitable right, remedy or claim under or in respect of this Agreement. The Litigation Sub-Trust Assets shall be held for the sole and exclusive benefit of the Litigation Sub-Trust Beneficiary.

11.4 Notices. All notices, directions, instructions, confirmations, consents and requests required or permitted by the terms hereof shall, unless otherwise specifically provided herein, be in writing and shall be sent by first class mail, facsimile, overnight mail or in the case of mailing to a non-United States address, air mail, postage prepaid, addressed to:

(a) If to the Litigation Trustee:

Marc S. Kirschner
c/o Goldin Associates LLC, a Teneo Company
350 Fifth Avenue
New York, New York 10118

With a copy to:

[insert contact for counsel to the Litigation Trustee].

(b) If to the Claimant Trustee:

Claimant Trustee
c/o **[insert contact info for Claimant Trustee]**

With a copy to:

~~**[insert contact for counsel to the Claimant Trustee].**~~

Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Blvd, 13th Floor
Los Angeles, CA 90067
Attn: Jeffrey Pomerantz (jpomerantz@pszjlaw.com)
Ira Kharasch (ikharasch@pszjlaw.com)
Gregory Demo (gdemo@pszjlaw.com)

Notice mailed shall be effective on the date mailed or sent. Any Person may change the address at which it is to receive notices under this Agreement by furnishing written notice pursuant to the provisions of this Section 11.4 to the entity to be charged with knowledge of such change.

11.5 Severability. Any provision hereof which is prohibited or unenforceable in any jurisdiction shall, as to such jurisdiction, be ineffective to the extent of such prohibition or unenforceability without invalidating the remaining provisions hereof, and any such prohibition or unenforceability in any jurisdiction shall not invalidate or render unenforceable such provisions in another jurisdiction.

11.6 Counterparts. This Agreement may be executed by the parties hereto in separate counterparts, each of which when so executed and delivered shall be an original, but all such counterparts shall together constitute but one and the same instrument.

11.7 Binding Effect, etc. All covenants and agreements contained herein shall be binding upon, and inure to the benefit of, the Litigation Sub-Trust, the Litigation Trustee, and the Litigation Sub-Trust Beneficiary, and their respective successors and assigns. Any notice, direction, consent, waiver or other instrument or action by any Litigation Sub-Trust Beneficiary shall bind its successors and assigns.

11.8 Headings; References. The headings of the various Sections herein are for convenience of reference only and shall not define or limit any of the terms or provisions hereof.

11.9 Governing Law. This Agreement shall in all respects be governed by, and construed in accordance with the laws of the State of Delaware, including all matters of constructions, validity and performance.

11.10 Consent to Jurisdiction. Each of the parties hereto consents and submits to the exclusive jurisdiction of the Bankruptcy Court for any action or proceeding instituted for the enforcement and construction of any right, remedy, obligation, or liability arising under or by reason of this Agreement or the Plan.

11.11 Transferee Liabilities. The Litigation Sub-Trust shall have no liability for, and the Litigation Sub-Trust Assets shall not be subject to, any claim arising by, through or under the Debtor except as expressly set forth in the Plan or in this Agreement. In no event shall the Litigation Trustee or the Litigation Sub-Trust Beneficiary have any personal liability for such claims. If any liability shall be asserted against the Litigation Sub-Trust or the Litigation Trustee as the transferee of the Litigation Sub-Trust Assets on account of any claimed liability of, through or under the Debtor or Reorganized Debtor, the Litigation Trustee may use such part of the Litigation Sub-Trust Assets as may be necessary to contest any such claimed liability and to pay, compromise, settle or discharge same on terms reasonably satisfactory to the Litigation Trustee as a Litigation Sub-Trust Expense.

[Remainder of Page Intentionally Blank]

IN WITNESS HEREOF, the parties hereto have caused this Litigation Trust Agreement to be duly executed by their respective officers thereunto duly authorized on the day and year first written above.

Claimant Trustee

By: _____
James P. Seery, Jr., not individually but
solely in his capacity as the Claimant
Trustee

Litigation Trustee

By: _____
Marc S. Kirschner, not individually but
solely in his capacity as the Litigation Trustee

Document comparison by Workshare 9.5 on Monday, January 04, 2021 6:46:22 PM

Input:	
Document 1 ID	PowerDocs://DOCS_NY/41525/2
Description	DOCS_NY-#41525-v2-Highland_-_Litigation_Trust_Agreement
Document 2 ID	PowerDocs://DOCS_NY/41525/8
Description	DOCS_NY-#41525-v8-Highland_-_Litigation_Trust_Agreement
Rendering set	Standard

Legend:	
<u>Insertion</u>	
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Style change	
Format change	
Moved deletion	
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Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

Statistics:	
	Count
Insertions	49
Deletions	59
Moved from	4
Moved to	4
Style change	0
Format changed	0
Total changes	116

From: Michael Lynn <dmljng@gmail.com>
Sent: Saturday, November 14, 2020 12:12 PM
To: James Seery
Cc: Russell Nelms; John Dubel
Subject: Highland

Hi Jim

I just had a call from our client. He said a Trussway subsidiary (SST I believe) was sold last week. As the hope of a "Grand Bargain" seems to be fading, he would like an opportunity to buy Highland assets you have decided to dispose of. It would seem to be to the benefit of the estate to give Jim the opportunity to bid or outbid an existing offer for a given asset. Accordingly we would ask that we be informed of assets that will go on the block when other prospective purchasers are so advised.

I thank you in advance for your cooperation in this matter.

Michael

Sent from my BlackBerry 10 smartphone.

From: Michael Lynn <dmljng@gmail.com>
Sent: Monday, November 16, 2020 12:34 PM
To: Jeff Pomerantz; GDemo@pszjlaw.com; Ira Kharasch; John A. Morris
Cc: James Seery; John Dubel; Russell Nelms
Subject: Highland sales

Please let me know if any sales of entities or property belonging directly or through subsidiaries of Highland are expected to be sold in the next two weeks. Thanks.

Sent from my BlackBerry 10 smartphone.

**Monthly Operating Report
ACCRUAL BASIS**

CASE NAME:	Highland Capital Management
CASE NUMBER:	19-34054
JUDGE:	Stacey Jernigan

**UNITED STATES BANKRUPTCY COURT
NORTHERN & EASTERN DISTRICTS OF TEXAS
REGION 6
MONTHLY OPERATING REPORT**

MONTH ENDING: November 2020
MONTH YEAR

IN ACCORDANCE WITH TITLE 28, SECTION 1746, OF THE UNITED STATES CODE, I DECLARE UNDER PENALTY OF PERJURY THAT I HAVE EXAMINED THE FOLLOWING MONTHLY OPERATING REPORT (ACCRUAL BASIS-1 THROUGH ACCRUAL BASIS-7) AND THE ACCOMPANYING ATTACHMENTS AND, TO THE BEST OF MY KNOWLEDGE, THESE DOCUMENTS ARE TRUE, CORRECT, AND COMPLETE. DECLARATION OF THE PREPARER (OTHER THAN RESPONSIBLE PARTY) IS BASED ON ALL INFORMATION OF WHICH PREPARER HAS ANY KNOWLEDGE.

RESPONSIBLE PARTY:

ORIGINAL SIGNATURE OF RESPONSIBLE PARTY

James Seery

PRINTED NAME OF RESPONSIBLE PARTY

Chief Restructuring Officer/ Chief Executive Officer
TITLE

DATE

PREPARER:

ORIGINAL SIGNATURE OF PREPARER

Frank Waterhouse

PRINTED NAME OF PREPARER

Chief Financial Officer

TITLE

1.07.21

DATE

Monthly Operating Report
ACCRUAL BASIS-1

CASE NAME:	Highland Capital Management, LP
CASE NUMBER:	19-12239-CSS

Comparative Balance Sheet
(in thousands)

	<u>10/15/2019</u>	<u>12/31/2019 ⁽⁶⁾</u>	<u>11/30/2020 ⁽⁶⁾</u>
Assets			
Cash and cash equivalents	2,529	9,501	13,367
Investments, at fair value ⁽³⁾	232,620	232,820	106,344
Equity method investees ⁽³⁾	161,819	183,529	94,853
Management and incentive fee receivable	2,579	1,929	1,496
Fixed assets, net	3,754	3,521	2,670
Due from affiliates ⁽¹⁾	151,901	146,276	150,152
Reserve against notes receivable		(57,963)	(59,393)
Other assets	11,311	11,463	8,961
Total assets	<u>\$ 566,513</u>	<u>\$ 531,076</u>	<u>\$ 318,449</u>
Liabilities and Partners' Capital			
Pre-petition accounts payable ⁽⁴⁾	1,176	1,141	1,077
Post-petition accounts payable ⁽⁴⁾	-	2,042	750
Secured debt:			
Frontier	5,195	5,195	5,195
Jefferies	30,328	30,020	-
Accrued expenses and other liabilities ⁽⁴⁾	59,203	63,275	58,254
Accrued re-organization related fees ⁽⁵⁾	-	5,547	7,823
Claim accrual ⁽²⁾	73,997	73,997	73,997
Partners' capital	396,614	349,857	171,353
Total liabilities and partners' capital	<u>\$ 566,513</u>	<u>\$ 531,076</u>	<u>\$ 318,449</u>

⁽¹⁾ Includes various notes receivable at carrying value, except note due from Hunter Mountain Investment Trust which is fully reserved against (\$59M reserve). Fair value has not been determined with respect to any of the notes.

⁽²⁾ Uncontested portion of Redeemer claim less applicable offsets. Potential for additional liability based on future events. No interest has been accrued beyond petition date. No additional accruals will be made on settlement claims until further approval by the court.

⁽³⁾ Mark to market gains/(losses) on investments include pricing updates for publicly traded securities and other positions with readily available market price information. Certain limited partnership interests normally marked to a NAV statement have not been updated as of period end as statements are generally available on a one-month lag.

⁽⁴⁾ Note on accruals: expenses recorded in Accounts Payable and Accrued Expenses and Other Liabilities reflect invoices recorded through accounts payable, legal invoice accruals, and normal course operating accruals, but do not reflect estimates for other incurred, but not yet received invoices. For balance sheet dates other than the Petition Date, amounts include both pre-petition and post-petition liabilities. There are additional compensation accrual amounts of \$5.7mm that are not accounted for as of the report date

⁽⁵⁾ Beginning December 31st, 2019, Debtor accrued for post-petition re-organization fees based upon an estimate of fees incurred to date.

⁽⁶⁾ All balances at December 31st, 2019 are preliminary, unaudited, and subject to further year-end closing entries pursuant to the normal year-end closing process. As a result, balances for subsequent months have and will fluctuate.

Monthly Operating Report ACCURAL BASIS-2

CASE NAME:	Highland Capital Management, LP
CASE NUMBER:	19-12239-CSS

Income Statement ¹

(in thousands)

	Date	Filing to Year Ended ⁽⁴⁾	Month ended ⁽⁴⁾	Filing to date ⁽⁴⁾
	10/16/19 - 10/31/19	2019	11/30/2020	
Revenue:				
Management fees	975	4,528	1,528	22,641
Shared services fees	283	1,588	579	8,465
Other income	99	1,582	296	5,373
Total operating revenue	1,357	7,697	2,403	36,479
Operating expenses:				
Compensation and benefits ⁽⁵⁾	997	1,498	1,626	19,038
Professional services	256	64	273	2,657
Investment research and consulting	10	266	4	969
Marketing and advertising expense	-	370	(65)	463
Depreciation expense	82	244	76	1,092
Bad debt expense reserve	-	8,410	124	9,839
Other operating expenses	201	1,265	539	5,647
Total operating expenses	1,545	12,118	2,577	39,706
Operating income/(loss)	(188)	(4,421)	(174)	(3,227)
Other income/expense:				
Interest income	250	1,230	481	6,602
Interest expense	(107)	(286)	(21)	(718)
Reserve against notes receivable	-	(57,963)	-	(57,963)
Re-org related expenses ⁽²⁾	-	(5,547)	(2,738)	(32,876)
Independent director fees	-	-	(210)	(2,187)
Other income/expense	32	32	(1)	(170)
Total other income/expense	175	(62,534)	(2,490)	(87,312)
Net realized gains/(losses) on investments	339	618	(4,819)	(30,030)
Net change in unrealized gains/(losses) of investments ⁽³⁾	2,654	(955)	5,143	(36,384)
	2,993	(337)	324	(66,414)
Net earnings/(losses) from equity method investees ⁽³⁾	(20)	14,918	(391)	(73,925)
Net income/(loss)	\$ 2,959	\$ (52,374)	\$ (2,732)	\$ (230,878)

(1) Note on accruals: expenses recorded in the Income Statement reflect invoices recorded through accounts payable, legal invoice accruals, and normal course operating accruals, but do not reflect estimates for other incurred, but not yet received invoices.

(2) Debtor funded various retainers totaling \$790k prior to the petition date, which were entirely expensed as of the petition date.

(3) Mark to market gains/(losses) on investments include pricing updates for publicly traded securities and other positions with readily available market price information. Certain limited partnership interests normally marked to a NAV statement have not been updated as of period end as statements are generally available on a one-month lag.

(4) All balances are preliminary, unaudited, and subject to further year-end closing entries pursuant to the normal year-end closing process. As a result, operating results will change as these entries are made.

(5) There are additional compensation accrual amounts of \$5.7mm that are not accounted for as of the report date.

Monthly Operating Report
ACCRUAL BASIS-3A

CASE NAME:	Highland Capital Management
CASE NUMBER:	19-34054

	FILING TO YEAR END 2019	QUARTER 1	QUARTER 2	QUARTER 3	OCTOBER	NOVEMBER
CASH RECEIPTS AND DISBURSEMENTS						
1. CASH - BEGINNING OF MONTH	\$ 2,554,230	\$ 9,501,409	\$ 12,532,467	\$ 14,993,872	\$ 5,887,813	\$ 8,752,728
RECEIPTS FROM OPERATIONS						
2. OTHER OPERATING RECEIPTS	\$ 1,862,757	\$ 1,379,338	\$ 2,983,221	\$ 2,259,736	\$ 598,804	\$ 1,568,241
3. MANAGEMENT FEES AND OTHER RELATED RECEIPTS	\$ 3,156,742	\$ 7,555,297	\$ 6,179,437	\$ 5,575,680	\$ 1,367,428	\$ 5,473,112
COLLECTION OF ACCOUNTS RECEIVABLE						
4. PREPETITION	\$ 3,593,108	\$ 76,569	\$ 3,727	\$ -	\$ -	\$ 197,173
5. POSTPETITION ¹	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6. TOTAL OPERATING RECEIPTS	\$ 8,612,608	\$ 9,011,204	\$ 9,166,385	\$ 7,835,415	\$ 1,966,232	\$ 7,238,525
NON-OPERATING RECEIPTS						
7. THIRD PARTY FUND ACTUAL/EXPECTED DISTRIBUTIONS	\$ 423,468	\$ 18,992,786	\$ 797,571	\$ 610,254	\$ -	\$ 289,873
8. DIVS, PAYDOWNS, MISC FROM INVESTMENT ASSETS	\$ 1,338,069	\$ 477,479	\$ 74,376	\$ 5,311	\$ 1,242	\$ 1,244
9. OTHER (ATTACH LIST)	\$ 3,390,286	\$ 1,407,103	\$ 10,010,000	\$ 8,817,099	\$ 3,269,000	\$ 2,623,121
10. TOTAL NON-OPERATING RECEIPTS	\$ 5,151,822	\$ 20,877,369	\$ 10,881,947	\$ 9,432,664	\$ 3,270,242	\$ 2,914,237
11. TOTAL RECEIPTS	\$ 13,764,430	\$ 29,888,573	\$ 20,048,331	\$ 17,268,080	\$ 5,236,475	\$ 10,152,762
12. TOTAL CASH AVAILABLE				\$ 32,261,951	\$ 11,124,288	\$ 18,905,490
OPERATING DISBURSEMENTS						
13. PAYROLL, BENEFITS, AND TAXES + EXP REIMB	\$ 3,776,446	\$ 8,825,042	\$ 4,886,314	\$ 8,806,880	\$ 1,347,709	\$ 1,602,768
14. SINGAPORE SERVICE FEES	\$ 95,118	\$ 58,129	\$ 2,965	\$ -	\$ 10,547	\$ -
15. HCM LATIN AMERICA	\$ 200,000	\$ 100,000	\$ -	\$ -	\$ -	\$ -
16. THIRD PARTY FUND CAPITAL CALL OBLIGATION	\$ 1,426,987	\$ 7,812,469	\$ 3,087,163	\$ 979,631	\$ 110,220	\$ 722,194
17. UTILITIES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
18. INSURANCE	\$ -	\$ 533,940	\$ 376,376	\$ 163,400	\$ -	\$ -
19. INVENTORY PURCHASES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
20. VEHICLE EXPENSES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
21. TRAVEL	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
22. ENTERTAINMENT	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
23. REPAIRS & MAINTENANCE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
24. SUPPLIES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
25. ADVERTISING	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
26. OTHER (ATTACH LIST)	\$ 1,318,700	\$ 3,283,898	\$ 3,195,054	\$ 3,633,331	\$ 653,828	\$ 1,022,221
27. TOTAL OPERATING DISBURSEMENTS	\$ 6,817,251	\$ 20,613,478	\$ 11,547,870	\$ 13,583,243	\$ 2,122,305	\$ 3,347,183
REORGANIZATION EXPENSES						
28. PROFESSIONAL FEES	\$ -	\$ 5,460,546	\$ 5,572,032	\$ 11,551,682	\$ 39,255	\$ 1,731,613
29. U.S. TRUSTEE FEES	\$ -	\$ 68,173	\$ 167,025	\$ 277,924	\$ -	\$ 250,000
30. OTHER (ATTACH LIST)	\$ -	\$ 715,317	\$ 300,000	\$ 961,289	\$ 210,000	\$ 210,000
31. TOTAL REORGANIZATION EXPENSES	\$ -	\$ 6,244,037	\$ 6,039,057	\$ 12,790,896	\$ 249,255	\$ 2,191,613
32. TOTAL DISBURSEMENTS	\$ 6,817,251	\$ 26,857,515	\$ 17,586,927	\$ 26,374,138	\$ 2,371,560	\$ 5,538,796
33. NET CASH FLOW	\$ 6,947,179	\$ 3,031,058	\$ 2,461,404	\$ (9,106,059)	\$ 2,864,915	\$ 4,613,966
34. CASH - END OF MONTH	\$ 9,501,409	\$ 12,532,467	\$ 14,993,872	\$ 5,887,813	\$ 8,752,728	\$ 13,366,694

1 All postpetition receipts are included in line 3, Management Fees and Other Related Receipts.

Monthly Operating Report
ACCRUAL BASIS-3B

CASE NAME:	Highland Capital Management
CASE NUMBER:	19-34054

OPERATING RECEIPTS - OTHER

Date	Amount	Type
11/12/2020	2,623,121	SSP Loan

OPERATING DISBURSMENTS - OTHER

Date	Amount	Vendor
11/2/2020	30,820	Third Party Consultant
11/2/2020	159,061	Crescent TC Investors LP
11/4/2020	46,292	East West Visa Payment
11/6/2020	471	UPS Supply Chain Solutions
11/6/2020	600	Action Shred of Texas
11/6/2020	1,019	GRUBHUB for Work
11/6/2020	1,443	S&P Global Market Intelligence
11/6/2020	1,554	Canteen Vending Services
11/6/2020	2,466	Thomson West
11/6/2020	4,074	Concur Technologies, Inc.
11/6/2020	4,996	Oak Cliff Office Products
11/6/2020	5,885	ABM
11/6/2020	14,520	Third Party Consultant
11/6/2020	18,042	Siepe Software, LLC
11/6/2020	31,388	Centroid
11/6/2020	35,200	Intex Solutions, Inc.
11/6/2020	47,471	Houlihan Lokey
11/6/2020	199,718	Bloomberg Finance LP
11/6/2020	446	Ace Parking Management Inc.
11/10/2020	6,190	TW Telecom Holdings, llc
11/10/2020	53,123	John R Ames, CTA
11/10/2020	2,669	Iron Mountain Records Management
11/13/2020	4,591	Third Party Consultant
11/13/2020	95,940	Bloomberg Finance LP
11/13/2020	6,271	Intelligent Discovery Solutions, Inc.
11/16/2020	118	Arkadin, Inc.
11/16/2020	224	American Solutions for Business
11/16/2020	273	UPS Supply Chain Solutions
11/16/2020	508	Verity Group
11/16/2020	1,160	Canteen Vending Services
11/16/2020	1,335	GRUBHUB for Work
11/16/2020	2,129	NYSE MARKET, INC
11/16/2020	5,391	ICE Data Pricing & Reference Data, LLC
11/16/2020	7,995	Intralinks
11/16/2020	11,496	KPMG LLP
11/17/2020	2,092	Zayo Group, LLC
11/17/2020	971	EastWest Bank
11/19/2020	825	Xerox Corporation
11/20/2020	138	AT&T
11/20/2020	4,629	Liberty Life Assurance Company of Boston - Group Benefits
11/20/2020	15,250	HE Peoria Place
11/20/2020	12,500	Bloomberg Finance LP
11/20/2020	549	Pitney Bowes Financial Services LLC
11/20/2020	32	Pitney Bowes Financial Services LLC
11/20/2020	32	Pitney Bowes Financial Services LLC
11/20/2020	2,845	AT&T
11/20/2020	790	AT&T
11/20/2020	870	AT&T
11/20/2020	7,251	AT&T
11/23/2020	11,888	Flexential Colorado Corp.
11/23/2020	7,500	MacroMavens, LLC
11/23/2020	1,375	Canteen Vending Services
11/23/2020	146	Secured Access Systems, LLC
11/23/2020	289	UPS Supply Chain Solutions
11/23/2020	249	CHASE COURIERS, INC
11/23/2020	225	Four Seasons Landscaping, LLC
11/23/2020	481	DTCC ITP LLC
11/23/2020	131,149	Siepe Services, LLC
11/25/2020	1,422	GRUBHUB for Work
11/25/2020	2,845	AT&T
11/30/2020	11,000	Third Party Consultant
1,022,221		

REORGANIZATION EXPENSES - OTHER

Date	Amount	Description
11/2/2020	30,000	Dubel & Associates, L.L.C.
11/2/2020	150,000	J.P. Seery & Co. LLC
11/2/2020	30,000	Nelms and Associates
210,000		

Monthly Operating Report
ACCRUAL BASIS-4

CASE NAME:	Highland Capital Management
CASE NUMBER:	19-34054

MGMT FEE RECEIVABLE AGING ²			August ³	September ³	October ³	November ³
1.	0-30		\$1,768,818	\$2,577,696	\$3,148,887	\$1,495,877
2.	31-60		\$772,384		\$807,441	
3.	61-90			\$772,384		
4.	91+				\$746,913	
5.	TOTAL MGMT FEE RECEIVABLE		\$ 2,541,202	\$ 3,350,080	\$ 4,703,241	\$1,495,877
6.	AMOUNT CONSIDERED UNCOLLECTIBLE					
7.	MGMT FEE RECEIVABLE (NET)		\$ 2,541,202	\$ 3,350,080	\$ 4,703,241	\$1,495,877

AGING OF POSTPETITION TAXES AND PAYABLES			MONTH: November 2020		
TAXES PAYABLE	0-30 DAYS	31-60 DAYS	61-90 DAYS	91+ DAYS	TOTAL
1. FEDERAL					\$0
2. STATE					\$0
3. LOCAL					\$0
4. OTHER (ATTACH LIST)					\$0
5. TOTAL TAXES PAYABLE	\$0	\$0	\$0	\$0	\$0

6. ACCOUNTS PAYABLE	\$625,935	\$6,277	\$17,276	\$100,881	\$750,368
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STATUS OF POSTPETITION TAXES ¹		MONTH: November 2020		
FEDERAL	BEGINNING TAX LIABILITY	AMOUNT WITHHELD AND/OR ACCRUED	AMOUNT PAID	ENDING TAX LIABILITY
1. WITHHOLDING				\$0
2. FICA-EMPLOYEE				\$0
3. FICA-EMPLOYER				\$0
4. UNEMPLOYMENT				\$0
5. INCOME				\$0
6. OTHER (ATTACH LIST)				\$0
7. TOTAL FEDERAL TAXES	\$0	\$0	\$0	\$0
STATE AND LOCAL				
8. WITHHOLDING				\$0
9. SALES				\$0
10. EXCISE				\$0
11. UNEMPLOYMENT				\$0
12. REAL PROPERTY	\$0	\$0	\$0	\$0
13. PERSONAL PROPERTY				\$0
14. OTHER (ATTACH LIST)				\$0
15. TOTAL STATE & LOCAL	\$0	\$0	\$0	\$0
16. TOTAL TAXES	\$0	\$0	\$0	\$0

1 The Debtor funds all state and federal employment taxes to Paylocity, who files all required federal and state related employment reports and withholdings.

2 Aging based on when management fee is due and payable.

3 All balances are preliminary, unaudited, and subject to further year-end closing entries pursuant to the normal year-end closing process.

Monthly Operating Report
ACCRUAL BASIS-5

CASE NAME:	Highland Capital Management
CASE NUMBER:	19-34054

MONTH: November 2020

BANK RECONCILIATIONS	Account #1	Account #2	Account #3	Account #4	Account #5	Account #6	
A. BANK:	East West Bank	East West Bank	Maxim Group	Jefferies LLC	Nexbank	East West Bank	
B. ACCOUNT NUMBER:	x4686	x4693	x1885	x0932	x5891	x5848	TOTAL
C. PURPOSE (TYPE):	Operating	Insurance	Brokerage	Brokerage	CD	Prepaid Card	
1. BALANCE PER BANK STATEMENT ¹	\$ 13,124,581	\$ 3,842	\$ 30	\$ -	\$ 138,190	\$ 100,068	\$ 13,366,710
2. ADD: TOTAL DEPOSITS NOT CREDITED							\$ -
3. SUBTRACT: OUTSTANDING CHECKS							\$ -
4. OTHER RECONCILING ITEMS							\$ -
5. MONTH END BALANCE PER BOOKS	\$ 13,124,581	\$ 3,842	\$ 30	\$ -	\$ 138,190	\$ 100,068	\$ 13,366,710
6. NUMBER OF LAST CHECK WRITTEN	100510	n/a	n/a	n/a	n/a	n/a	

INVESTMENT ACCOUNTS	DATE OF PURCHASE	TYPE OF INSTRUMENT	PURCHASE PRICE	CURRENT VALUE
7. BANK, ACCOUNT NAME & NUMBER				
8.				
9.				
10.				
11. TOTAL INVESTMENTS			\$0	\$0

CASH	CURRENCY ON HAND
12.	\$0
13. TOTAL CASH - END OF MONTH	\$13,366,710

1 Account x6342 is now closed.

**Monthly Operating Report
ACCRUAL BASIS-6**

CASE NAME:	Highland Capital Management
CASE NUMBER:	19-34054

MONTH: November 2020

PAYMENTS TO INSIDERS AND PROFESSIONALS

INSIDERS				
NAME		TYPE OF PAYMENT	AMOUNT PAID	TOTAL PAID POST PETITION
1	Frank Waterhouse	Salary	\$33,333	\$427,083
2	Frank Waterhouse	Expense Reimbursement	\$384	\$6,605
3	Scott Ellington	Salary	\$37,500	\$506,250
4	Scott Ellington	Expense Reimbursement	\$260	\$6,598
5	James Dondero	Salary	\$0	\$129,972
6	James Dondero	Expense Reimbursement ¹	\$0	\$16,918
7	Thomas Surgent	Salary	\$33,333	\$450,000
8	Thomas Surgent	Expense Reimbursement	\$400	\$4,981
9	Trey Parker	Salary	\$0	\$131,250
10	Trey Parker	Expense Reimbursement	\$0	\$6,212
TOTAL PAYMENTS TO INSIDERS			\$105,210	\$1,685,869

¹ The total amount of reimbursements during the reporting month also included \$3,129 for use of the credit card by the Debtor for office related expenses such as subscriptions and IT equipment/software.

PROFESSIONALS ²						
NAME		DATE OF MONTHLY FEE APPLICATION	AMOUNT APPROVED	AMOUNT PAID	TOTAL PAID TO DATE	TOTAL INCURRED & UNPAID
1.	Kurtzman Carson Consultants LLC		41,435	41,435	573,957	54,170
2.	Sidley Austin LLP		511,998	511,998	6,319,089	821,421
3.	Young Conaway Stargatt & Taylor LLP		-	-	281,156	-
4.	FTI Consulting, Inc.		382,499	382,499	3,989,791	425,593
5.	Pachulski Stang Ziehl & Jones LLP		541,680	541,680	8,976,900	970,463
6	Hayward & Associates PLLC		4,871	4,871	261,283	67,488
7	Development Specialists, Inc.		249,129	249,129	2,600,354	249,129
8	Foley & Lardner LLP		-	-	464,294	132,045
9	Mercer (US) Inc.		-	-	170,284	-
10	Wilmer Cutler Pickering Hale and Dorr LLP		-	-	618,643	
11	Meta-e Discovery LLC		-	-	165,000	
TOTAL PAYMENTS TO PROFESSIONALS				1,731,613	24,420,749	2,720,310

² Does not include payments to ordinary course professionals.

POSTPETITION STATUS OF SECURED NOTES, LEASES PAYABLE AND ADEQUATE PROTECTION PAYMENTS

	NAME OF CREDITOR	SCHEDULED MONTHLY PAYMENTS DUE	AMOUNTS PAID DURING MONTH	TOTAL UNPAID POSTPETITION
1.	Crescent TC Investors LP (rent portion only)	130,364	130,364	-
2.				
3.				
4.				
5.				
6.	TOTAL	130,364	\$130,364	\$0

Monthly Operating Report

ACCRUAL BASIS-7

CASE NAME:	Highland Capital Management
CASE NUMBER:	19-34054

MONTH: November 2020

QUESTIONNAIRE

	YES	NO
1. HAVE ANY ASSETS BEEN SOLD OR TRANSFERRED OUTSIDE THE NORMAL COURSE OF BUSINESS THIS REPORTING PERIOD?		x
2. HAVE ANY FUNDS BEEN DISBURSED FROM ANY ACCOUNT OTHER THAN A DEBTOR IN POSSESSION ACCOUNT?		x
3. ARE ANY POSTPETITION RECEIVABLES (ACCOUNTS, NOTES, OR LOANS) DUE FROM RELATED PARTIES?	x	
4. HAVE ANY PAYMENTS BEEN MADE ON PREPETITION LIABILITIES THIS REPORTING PERIOD?		x
5. HAVE ANY POSTPETITION LOANS BEEN RECEIVED BY THE DEBTOR FROM ANY PARTY?		x
6. ARE ANY POSTPETITION PAYROLL TAXES PAST DUE?		x
7. ARE ANY POSTPETITION STATE OR FEDERAL INCOME TAXES PAST DUE?		x
8. ARE ANY POSTPETITION REAL ESTATE TAXES PAST DUE?		x
9. ARE ANY OTHER POSTPETITION TAXES PAST DUE?		x
10. ARE ANY AMOUNTS OWED TO POSTPETITION CREDITORS DELINQUENT?		x
11. HAVE ANY PREPETITION TAXES BEEN PAID DURING THE REPORTING PERIOD?		x
12. ARE ANY WAGE PAYMENTS PAST DUE?		x

IF THE ANSWER TO ANY OF THE ABOVE QUESTIONS IS "YES," PROVIDE A DETAILED EXPLANATION OF EACH ITEM. ATTACH ADDITIONAL SHEETS IF NECESSARY.

3 Debtor generates fee income and other receipts from various related parties in normal course, see cash management motion for further discussion.

INSURANCE

	YES	NO
1. ARE WORKER'S COMPENSATION, GENERAL LIABILITY AND OTHER NECESSARY INSURANCE COVERAGES IN EFFECT?	x	
2. ARE ALL PREMIUM PAYMENTS PAID CURRENT?	x	
3. PLEASE ITEMIZE POLICIES BELOW.		

IF THE ANSWER TO ANY OF THE ABOVE QUESTIONS IS "NO," OR IF ANY POLICIES HAVE BEEN CANCELLED OR NOT RENEWED DURING THIS REPORTING PERIOD, PROVIDE AN EXPLANATION BELOW. ATTACH ADDITIONAL SHEETS IF NECESSARY.

INSTALLMENT PAYMENTS			
TYPE OF POLICY	CARRIER	PERIOD COVERED	PAYMENT AMOUNT & FREQUENCY

From: [Clay Taylor](#)
To: [Jeffrey N. Pomerantz \(jpomerantz@pszilaw.com\)](#); [John Morris \(jmorris@pszilaw.com\)](#)
Cc: [Bryan Assink](#); [John Bonds](#); [Michael Lynn](#); [Ira D. Kharasch \(ikharasch@pszilaw.com\)](#); [Gregory V. Demo \(gdemo@pszilaw.com\)](#)
Subject: Highland Confirmation Hearing; Witness request and informal document requests from Jim Dondero
Date: Wednesday, January 20, 2021 2:26:18 PM

Jeff and John,

I am going to participate in the confirmation hearings on behalf of Mr. Dondero. I look forward to working with all of you. My contact information is below. Please cc each of John Bonds, Mike Lynn, Bryan Assink and myself related to the confirmation hearings going forward.

In advance of the hearing, I am making the following requests:

- To the extent you are not planning on calling J.P. Sevilla in your case in chief, will you make Mr. Sevilla available to be called as a witness in our case in chief without the need for a subpoena?
- If not, will you accept service of a subpoena on his behalf?
- I am going to participate in Mr. Seery's deposition, which I understand will be held on Monday beginning at 9:00 a.m. I presume this will be conducted electronically via Zoom or other such platform? Please let me know what the logistics are for participating and questioning the deponent.
- In conjunction therewith, please provide the following and let me know if it necessary for me to formally make a document production request of you for any or all of these items. Unfortunately, due to the timing for filing Witness and Exhibit Lists on Friday at noon, I need these ASAP and no later than 5:00 tomorrow:
 - All marketing materials prepared for the sale of any of the three assets that Highland and/or subsidiaries or its affiliates have sold during the course of this case. I understand that there are just three such sales: (i) sale of life settlement policies; (ii) sale of "Omnimax" asset; and (iii) sale of SSP, a subsidiary of, or affiliate of, Trussways; but if there are any more, I need those also (collectively referred to herein as the "Asset Sales")
 - Copies of the data room index or index of due diligence materials provided to buyers
 - Copies of any NDA or CA's executed in conjunction with parties looking at the Asset Sales
 - List of what was sent out to whom in any initial solicitation of the Asset Sales
 - List of whom expressed any interest in the Asset Sales
 - List of follow up materials sent to any party after an expression of interest, and, if NDA's and CA's were required, upon the execution of the NDA and CA
 - All communications by and between (i) Highland and (ii) potential buyers, or the ultimate buyer, in the Asset Sales during the due diligence, negotiation stage, contract execution and through closing
 - Copies of any sales contracts for the Asset Sales
 - Copies of any closing documents for the Asset Sales
 - Flow of Funds statement for each of the Asset Sales
 - Copies of any brokerage agreement related to any of the Asset Sales

- Copy of any employment agreement or engagement agreement by and between Mr. Seery and Highland and any amendments thereto
- Copy of the engagement agreement by and between Pachulski and Highland and any amendments thereto
- Copy of any proposed engagement agreement (draft or final) by and between Highland and Mr. Seery if the proposed plan is confirmed
- Copy of any proposed engagement agreement (draft or final) by and between Pachulski and Highland if the proposed plan is confirmed
- Copy of any proposed brokerage agreement (draft or final) by and between Highland and any asset broker if the proposed plan is confirmed

I know these are a lot of documents to request, if we need to meet and confer regarding a rolling production, to discuss narrowing the scope to the truly most relevant documents and the extension of any deadline for me to file a Witness and Exhibit list, I can make myself available. As I mentioned, my contact information is below.

Clay M. Taylor

Bonds Ellis Eppich Schafer Jones LLP

420 Throckmorton St. | Suite 1000 | Fort Worth, Texas 76102

cell 214.663.5988 | office 817.779.4300 | fax 817.405.6902

Clay.Taylor@bondsellis.com | [My Profile](#)

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From: [John A. Morris](#)
To: ["clay.taylor@bondellis.com"](mailto:clay.taylor@bondellis.com)
Cc: [Jeff Pomerantz](#); [Ira Kharasch](#); [Gregory V. Demo](#); [Michael Lynn](#); [John Bonds](#); [Bryan Assink](#)
Subject: Highland Confirmation Hearing; Witness request and informal document requests from Jim Dondero
Date: Thursday, January 21, 2021 11:45:09 AM

Clay:

Nice to meet you.

In response to your requests below:

1. We understand that Mr. Sevilla is represented by David Neier and believe it would be appropriate for you to confer with Mr. Neier with respect to your request.
2. I will include you on the list when I send the Zoom instructions for Monday's deposition; I typically do not receive them from the Court reporter until the day before so please be patient.
3. Finally, we are stunned by the voluminous document demands made for the first time six days before confirmation and on 25 hours' notice. The Court approved the adequacy of the Debtor's Disclosure Statement in November and Mr. Dondero could have sought discovery at any time since then. Mr. Dondero could have also sought discovery in connection with his earlier motion challenging the Debtor's ability to engage in certain transactions, but again failed to do so. Finally, and notably, the Debtor produced a substantial amount of financial information to Mr. Dondero on or about December 30, 2020, in response to his specific requests. We can see no legitimate basis for these last-minute, extensive requests particularly since Mr. Dondero filed his objection back on January 5, 2021.

Moreover, most of the requests have nothing to do with confirmation, or Mr. Dondero's objection, or are otherwise improper. Most of what is sought has to do with the process of assets sales or information obviously subject to the attorney client-privilege, none of which is relevant.

In short, the Debtor will not produce any of the documents on the grounds that (a) it would be unfair, prejudicial, and unduly burdensome to force the Debtor to divert resources days before confirmation; (b) the information is sought by an objector with a contingent and tangential interest in this case, at best; (c) the objector has already received substantial information and could have sought additional information instead of waiting until days before confirmation before doing so; (d) the requested information has little, if anything, to do with confirmation; and (e) the Debtor believes that the requests are made for the purpose of driving up the Debtor's costs, obtaining information of interest to Mr. Dondero but that is unrelated to confirmation, and otherwise creating a dispute where none should otherwise exist.

Please let me know if you have any questions.

Regards,

John

John A. Morris

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 212.561.7760

Tel: 212.561.7700 | Fax: 212.561.7777

jmorris@pszjlaw.com

[vCard](#) | [Bio](#) | [LinkedIn](#)



Los Angeles | San Francisco | Wilmington, DE | New York | Costa Mesa

From: Clay Taylor [mailto:clay.taylor@bondsellis.com]

Sent: Wednesday, January 20, 2021 3:26 PM

To: Jeff Pomerantz; John A. Morris

Cc: Bryan Assink; John Bonds; Michael Lynn; Ira Kharasch; Gregory V. Demo

Subject: Highland Confirmation Hearing; Witness request and informal document requests from Jim Dondero

Jeff and John,

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In advance of the hearing, I am making the following requests:

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- If not, will you accept service of a subpoena on his behalf?
- I am going to participate in Mr. Seery's deposition, which I understand will be held on Monday beginning at 9:00 a.m. I presume this will be conducted electronically via Zoom or other such platform? Please let me know what the logistics are for participating and questioning the deponent.
- In conjunction therewith, please provide the following and let me know if it necessary for me to formally make a document production request of you for any or all of these items. Unfortunately, due to the timing for filing Witness and Exhibit Lists on Friday at noon, I need these ASAP and no later than 5:00 tomorrow:
 - All marketing materials prepared for the sale of any of the three assets that Highland and/or subsidiaries or its affiliates have sold during the course of this case. I

002752

understand that there are just three such sales: (i) sale of life settlement policies; (ii) sale of "Omnimax" asset; and (iii) sale of SSP, a subsidiary of, or affiliate of, Trussways; but if there are any more, I need those also (collectively referred to herein as the "Asset Sales")

- Copies of the data room index or index of due diligence materials provided to buyers
- Copies of any NDA or CA's executed in conjunction with parties looking at the Asset Sales
- List of what was sent out to whom in any initial solicitation of the Asset Sales
- List of whom expressed any interest in the Asset Sales
- List of follow up materials sent to any party after an expression of interest, and, if NDA's and CA's were required, upon the execution of the NDA and CA
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- Copies of any sales contracts for the Asset Sales
- Copies of any closing documents for the Asset Sales
- Flow of Funds statement for each of the Asset Sales
- Copies of any brokerage agreement related to any of the Asset Sales
- Copy of any employment agreement or engagement agreement by and between Mr. Seery and Highland and any amendments thereto
- Copy of the engagement agreement by and between Pachulski and Highland and any amendments thereto
- Copy of any proposed engagement agreement (draft or final) by and between Highland and Mr. Seery if the proposed plan is confirmed
- Copy of any proposed engagement agreement (draft or final) by and between Pachulski and Highland if the proposed plan is confirmed
- Copy of any proposed brokerage agreement (draft or final) by and between Highland and any asset broker if the proposed plan is confirmed

I know these are a lot of documents to request, if we need to meet and confer regarding a rolling production, to discuss narrowing the scope to the truly most relevant documents and the extension of any deadline for me to file a Witness and Exhibit list, I can make myself available. As I mentioned, my contact information is below.

Clay M. Taylor

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regulations require that we inform you as follows: Any U.S. federal tax advice contained in this communication (including any attachments) is not intended to be used and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or tax-related matter.

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From: [Clay Taylor](#)
To: [John Morris \(jmorris@pszilaw.com\)](#)
Cc: [Bryan Assink](#); [Michael Lynn](#); [John Bonds](#); [Jeffrey N. Pomerantz \(jpomerantz@pszilaw.com\)](#); [Ira D. Kharasch \(ikharasch@pszilaw.com\)](#); [Gregory V. Demo \(gdemo@pszilaw.com\)](#)
Subject: RE: Highland Confirmation Hearing; Witness request and informal document requests from Jim Dondero
Date: Thursday, January 21, 2021 1:15:27 PM

John,

I am in receipt of your reply below. It actually did not come to me directly as it appears you had a typo in my e-mail address? I presume you got a bounce back for the e-mail to me? But I never got a follow up. None-the-less, I do have your reply via Bryan in my office, and thought it was worth reaching out.

First, thank you for your reply.

Second, as to the requested documents, we obviously have a different view as to relevance, any implication of attorney/client privilege and related issues mentioned below in your e-mail. But that is probably better discussed in a phone call. No need for a war of e-mails.

Third, as I mentioned below, I stand ready to meet and confer to narrow the scope of the documents requested to the bare essential minimum given the tight time frames involved before both Mr. Seery's deposition and the confirmation hearing. Are you available this afternoon or tomorrow morning?

Finally, to the extent you do not wish to meet and confer, can you inform me of your stance on, and availability for, (i) an emergency motion to compel and continuance, and (ii) a motion to set the same on an emergency basis. As you have undoubtedly noticed, we have served the previously informal document requests in a formal request to Highland and filed the same with the Court.

Clay M. Taylor

Bonds Ellis Eppich Schafer Jones LLP

420 Throckmorton St. | Suite 1000 | Fort Worth, Texas 76102

cell 214.663.5988 | office 817.779.4300 | fax 817.405.6902

Clay.Taylor@bondsellis.com | [My Profile](#)

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From: Bryan Assink <bryan.assink@bondsellis.com>

Sent: Thursday, January 21, 2021 11:51 AM

To: Clay Taylor <clay.taylor@bondsellis.com>

Subject: FW: Highland Confirmation Hearing; Witness request and informal document requests from Jim Dondero

He had your email address wrong. I am sure he will re-send but just in case.

From: John A. Morris <jmorris@pszjlaw.com>

Sent: Thursday, January 21, 2021 11:44 AM

To: 'clay.taylor@bondellis.com' <clay.taylor@bondellis.com>

Cc: Jeff Pomerantz <jpomerantz@pszjlaw.com>; Ira Kharasch <ikharasch@pszjlaw.com>; Gregory V. Demo <GDemo@pszjlaw.com>; Michael Lynn <michael.lynn@bondsellis.com>; John Bonds <john@bondsellis.com>; Bryan Assink <bryan.assink@bondsellis.com>

Subject: Highland Confirmation Hearing; Witness request and informal document requests from Jim Dondero

Clay:

Nice to meet you.

In response to your requests below:

1. We understand that Mr. Sevilla is represented by David Neier and believe it would be appropriate for you to confer with Mr. Neier with respect to your request.
2. I will include you on the list when I send the Zoom instructions for Monday's deposition; I typically do not receive them from the Court reporter until the day before so please be patient.
3. Finally, we are stunned by the voluminous document demands made for the first time six days before confirmation and on 25 hours' notice. The Court approved the adequacy of the Debtor's Disclosure Statement in November and Mr. Dondero could have sought discovery at any time since then. Mr. Dondero could have also sought discovery in connection with his earlier motion challenging the Debtor's ability to engage in certain transactions, but again failed to do so. Finally, and notably, the Debtor produced a substantial amount of financial information to Mr. Dondero on or about December 30, 2020, in response to his specific requests. We can see no legitimate basis for these last-minute, extensive requests particularly since Mr. Dondero filed his objection back on January 5, 2021.

Moreover, most of the requests have nothing to do with confirmation, or Mr. Dondero's objection, or are otherwise improper. Most of what is sought has to do with the process of assets sales or information obviously subject to the attorney client-privilege, none of which is relevant.

In short, the Debtor will not produce any of the documents on the grounds that (a) it would

be unfair, prejudicial, and unduly burdensome to force the Debtor to divert resources days before confirmation; (b) the information is sought by an objector with a contingent and tangential interest in this case, at best; (c) the objector has already received substantial information and could have sought additional information instead of waiting until days before confirmation before doing so; (d) the requested information has little, if anything, to do with confirmation; and (e) the Debtor believes that the requests are made for the purpose of driving up the Debtor's costs, obtaining information of interest to Mr. Dondero but that is unrelated to confirmation, and otherwise creating a dispute where none should otherwise exist.

Please let me know if you have any questions.

Regards,

John

John A. Morris

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 212.561.7760

Tel: 212.561.7700 | Fax: 212.561.7777

jmorris@pszjlaw.com

[vCard](#) | [Bio](#) | [LinkedIn](#)



Los Angeles | San Francisco | Wilmington, DE | New York | Costa Mesa

From: Clay Taylor [<mailto:clay.taylor@bondsellis.com>]

Sent: Wednesday, January 20, 2021 3:26 PM

To: Jeff Pomerantz; John A. Morris

Cc: Bryan Assink; John Bonds; Michael Lynn; Ira Kharasch; Gregory V. Demo

Subject: Highland Confirmation Hearing; Witness request and informal document requests from Jim Dondero

Jeff and John,

I am going to participate in the confirmation hearings on behalf of Mr. Dondero. I look forward to working with all of you. My contact information is below. Please cc each of John Bonds, Mike Lynn, Bryan Assink and myself related to the confirmation hearings going forward.

In advance of the hearing, I am making the following requests:

- To the extent you are not planning on calling J.P. Sevilla in your case in chief, will you make Mr. Sevilla available to be called as a witness in our case in chief without the need for a subpoena?

002757

- If not, will you accept service of a subpoena on his behalf?
- I am going to participate in Mr. Seery's deposition, which I understand will be held on Monday beginning at 9:00 a.m. I presume this will be conducted electronically via Zoom or other such platform? Please let me know what the logistics are for participating and questioning the deponent.
- In conjunction therewith, please provide the following and let me know if it necessary for me to formally make a document production request of you for any or all of these items. Unfortunately, due to the timing for filing Witness and Exhibit Lists on Friday at noon, I need these ASAP and no later than 5:00 tomorrow:
 - All marketing materials prepared for the sale of any of the three assets that Highland and/or subsidiaries or its affiliates have sold during the course of this case. I understand that there are just three such sales: (i) sale of life settlement policies; (ii) sale of "Omnimax" asset; and (iii) sale of SSP, a subsidiary of, or affiliate of, Trussways; but if there are any more, I need those also (collectively referred to herein as the "Asset Sales")
 - Copies of the data room index or index of due diligence materials provided to buyers
 - Copies of any NDA or CA's executed in conjunction with parties looking at the Asset Sales
 - List of what was sent out to whom in any initial solicitation of the Asset Sales
 - List of whom expressed any interest in the Asset Sales
 - List of follow up materials sent to any party after an expression of interest, and, if NDA's and CA's were required, upon the execution of the NDA and CA
 - All communications by and between (i) Highland and (ii) potential buyers, or the ultimate buyer, in the Asset Sales during the due diligence, negotiation stage, contract execution and through closing
 - Copies of any sales contracts for the Asset Sales
 - Copies of any closing documents for the Asset Sales
 - Flow of Funds statement for each of the Asset Sales
 - Copies of any brokerage agreement related to any of the Asset Sales
 - Copy of any employment agreement or engagement agreement by and between Mr. Seery and Highland and any amendments thereto
 - Copy of the engagement agreement by and between Pachulski and Highland and any amendments thereto
 - Copy of any proposed engagement agreement (draft or final) by and between Highland and Mr. Seery if the proposed plan is confirmed
 - Copy of any proposed engagement agreement (draft or final) by and between Pachulski and Highland if the proposed plan is confirmed
 - Copy of any proposed brokerage agreement (draft or final) by and between Highland and any asset broker if the proposed plan is confirmed

I know these are a lot of documents to request, if we need to meet and confer regarding a rolling production, to discuss narrowing the scope to the truly most relevant documents and the extension of any deadline for me to file a Witness and Exhibit list, I can make myself available. As I mentioned, my contact information is below.

Clay M. Taylor

Bonds Ellis Eppich Schafer Jones LLP

420 Throckmorton St. | Suite 1000 | Fort Worth, Texas 76102

cell 214.663.5988 | office 817.779.4300 | fax 817.405.6902

Clay.Taylor@bondsellis.com | [My Profile](#)

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002759

From: [Clay Taylor](#)
To: DNeier@winston.com
Cc: [Bryan Assink](#); [John Bonds](#); [Michael Lynn](#)
Subject: RE: Highland Capital Management, LP - Subpoena to Testify
Date: Thursday, January 21, 2021 10:19:42 AM

Dave,

Good to talk with you this morning. I look forward to working with you.

As I mentioned, I will be appearing in the Highland case on behalf of Mr. Dondero for my firm at the Highland confirmation hearing. We request that you agree to accept service on his behalf of a subpoena (or just agree that he will appear) to be called as a witness at the confirmation hearing to be held T-Th of next week. As that confirmation hearing approaches, hopefully we can narrow down specifically what day and time he would be called, or find a way to alert him X hours in advance of being called so he does not have to attend the whole thing if he had not planned on doing so and has no desire to do so.

My contact information is below.

Clay M. Taylor

Bonds Ellis Eppich Schafer Jones LLP

420 Throckmorton St. | Suite 1000 | Fort Worth, Texas 76102

cell 214.663.5988 | office 817.779.4300 | fax 817.405.6902

Clay.Taylor@bondsellis.com | [My Profile](#)

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From: Neier, David <DNeier@winston.com>

Sent: Monday, December 14, 2020 7:47 AM

To: Bryan Assink <bryan.assink@bondsellis.com>

Cc: 'Michael Lynn' <dmljng@gmail.com>; John Bonds <john@bondsellis.com>; John Wilson <john.wilson@bondsellis.com>; Neier, David <DNeier@winston.com>

Subject: Highland Capital Management, LP - Subpoena to Testify at a Bankruptcy Court Hearing on December 16, 2020 at 1:30 p.m.

Good morning Bryan. We represent Mr. Sevilla. We request that you direct all communications concerning Mr. Sevilla to us.

Regards, DN

David Neier
Winston & Strawn, LLP
CELL: 914-772-1027

Winston & Strawn LLP
200 Park Avenue
New York, NY 10166-4193
OFFICE: (212) 294-5318
dneier@winston.com

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002761

Bryan Assink

From: Bryan Assink
Sent: Thursday, January 21, 2021 1:02 PM
To: David Neier
Cc: Clay Taylor; 'Michael Lynn'; John Bonds
Subject: In re: Highland Capital Management, LP - Subpoena on Jean Paul Sevilla to Testify at the Confirmation Hearing
Attachments: Subpoena (Sevilla) 1.21.21 [Final].pdf; 1790 - Notice of Subpoena on Sevilla.pdf; 1790-1 - Ex. 1 (Subpoena).pdf

Mr. Neier,

Attached please find a subpoena directed to Mr. Sevilla to appear and testify at the hearing to consider confirmation of the Debtor's Fifth Amended Plan, will is scheduled to commence starting on January 26, 2021 at 9:30 a.m. and continuing through January 27-28, if necessary.

We would appreciate it if you could please confirm that you will accept service of the subpoena on behalf of Mr. Sevilla. The attached notice of subpoena was also just filed on the docket for your reference.

Best,
Bryan

Bryan C. Assink, Associate
Bonds Ellis Eppich Schafer Jones LLP
420 Throckmorton St. | Suite 1000 | Fort Worth, Texas 76102
office 817.779.4297 | fax 817.405.6902
bryan.assink@bondsellis.com

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From: [Neier, David](#)
To: [Bryan Assink](#)
Cc: [Clay Taylor](#); [Michael Lynn](#); [John Bonds](#)
Subject: RE: In re: Highland Capital Management, LP - Subpoena on Jean Paul Sevilla to Testify at the Confirmation Hearing
Date: Thursday, January 21, 2021 1:07:24 PM

We will accept service on his behalf.

David Neier
Winston & Strawn, LLP
CELL: 914-772-1027

Winston & Strawn LLP
200 Park Avenue
New York, NY 10166-4193
OFFICE: (212) 294-5318
dneier@winston.com

From: Bryan Assink <bryan.assink@bondsellis.com>
Sent: Thursday, January 21, 2021 2:04 PM
To: Neier, David <DNeier@winston.com>
Cc: Clay Taylor <clay.taylor@bondsellis.com>; Michael Lynn <dmljng@gmail.com>; John Bonds <john@bondsellis.com>
Subject: In re: Highland Capital Management, LP - Subpoena on Jean Paul Sevilla to Testify at the Confirmation Hearing

Mr. Neier,

Attached please find a subpoena directed to Mr. Sevilla to appear and testify at the hearing to consider confirmation of the Debtor's Fifth Amended Plan, will is scheduled to commence starting on January 26, 2021 at 9:30 a.m. and continuing through January 27-28, if necessary.

We would appreciate it if you could please confirm that you will accept service of the subpoena on behalf of Mr. Sevilla. The attached notice of subpoena was also just filed on the docket for your reference.

Best,
Bryan

Bryan C. Assink, Associate
Bonds Ellis Eppich Schafer Jones LLP
420 Throckmorton St. | Suite 1000 | Fort Worth, Texas 76102
office 817.779.4297 | fax 817.405.6902
bryan.assink@bondsellis.com

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D. Michael Lynn
State Bar I.D. No. 12736500
John Y. Bonds, III
State Bar I.D. No. 02589100
Clay M. Taylor
State Bar I.D. No. 24033261
Bryan C. Assink
State Bar I.D. No. 24089009
BONDS ELLIS EPPICH SCHAFFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile

ATTORNEYS FOR JAMES DONDERO

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Case No. 19-34054
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.	§	Chapter 11
	§	
Debtor.	§	

NOTICE OF SERVICE OF DISCOVERY

PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, made applicable to this proceeding through Rules 7026, 7034, and 9014 of the Federal Rules of Bankruptcy Procedure, James Dondero (“Dondero”), on January 21, 2021, served *James Dondero’s Second Request for Production of Documents Directed to Highland Capital Management, L.P.* (the “Discovery Requests”) on Highland Capital Management, L.P. (the “Debtor”) in connection with the hearing to consider confirmation of the *Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.* [Docket No. 1472] (as amended or modified, the “Plan”) set for January 26, 2021 at 9:30 a.m. A true and correct copy of the Discovery Requests is attached hereto as “**Exhibit A.**”

Dated: January 21, 2021

Respectfully submitted,

/s/ Clay M. Taylor

D. Michael Lynn
State Bar I.D. No. 12736500
John Y. Bonds, III
State Bar I.D. No. 02589100
Clay M. Taylor
State Bar I.D. No. 24033261
Bryan C. Assink
State Bar I.D. No. 24089009
BONDS ELLIS EPPICH SCHAFFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile
Email: michael.lynn@bondsellis.com
Email: john@bondsellis.com
Email: clay.taylor@bondsellis.com
Email: bryan.assink@bondsellis.com

ATTORNEYS FOR JAMES DONDERO

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on January 21, 2021, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on counsel for the Debtor as listed below.

Jeffrey Pomerantz
John Morris
Ira Kharasch
Greg Demo
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Email: jpomerantz@pszjlaw.com
Email: jmorris@pszjlaw.com
Email: ikharasch@pszjlaw.com
Email: gdemo@pszjlaw.com

/s/ Bryan C. Assink

Bryan C. Assink

EXHIBIT A

D. Michael Lynn
State Bar I.D. No. 12736500
John Y. Bonds, III
State Bar I.D. No. 02589100
Clay M. Taylor
State Bar I.D. No. 24033261
Bryan C. Assink
State Bar I.D. No. 24089009
BONDS ELLIS EPPICH SCHAFFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile

ATTORNEYS FOR JAMES DONDERO

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Case No. 19-34054
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.	§	Chapter 11
	§	
Debtor.	§	

**JAMES DONDERO'S SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS DIRECTED TO HIGHLAND CAPITAL MANAGEMENT, L.P.**

TO: Highland Capital Management, L.P., by and through its attorneys of record, Jeffrey Pomerantz, Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067.

Pursuant to Rules 26, 34, and 45 of the Federal Rules of Civil Procedure, made applicable to this proceeding through Rules 7026, 7034, 9014, and 9016 of the Federal Rules of Bankruptcy Procedure, James Dondero ("Dondero") hereby requests that, in connection with the hearing to consider confirmation of the *Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.* [Docket No. 1472] (as amended or modified, the "Plan")¹ set for January 26, 2021 at 9:30 a.m., Highland Capital Management, L.P. (the "Debtor") produce for inspection and

¹ Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them in Debtor's motion for entry of an order approving its disclosure statement [Docket No. 1108].

copying, the documents identified below on or before **January 22, 2021 by 5 p.m.** Central Time (the “Requests”).

Dated: January 21, 2021

Respectfully submitted,

/s/ Clay M. Taylor

D. Michael Lynn

State Bar I.D. No. 12736500

John Y. Bonds, III

State Bar I.D. No. 02589100

Clay M. Taylor

State Bar I.D. No. 24033261

Bryan C. Assink

State Bar I.D. No. 24089009

BONDS ELLIS EPPICH SCHAFFER JONES LLP

420 Throckmorton Street, Suite 1000

Fort Worth, Texas 76102

(817) 405-6900 telephone

(817) 405-6902 facsimile

Email: michael.lynn@bondsellis.com

Email: john@bondsellis.com

Email: clay.taylor@bondsellis.com

Email: bryan.assink@bondsellis.com

ATTORNEYS FOR JAMES DONDERO

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on January 21, 2021, a true and correct copy of the foregoing document was served via email and the Court’s CM/ECF system on counsel for the Debtor as listed below.

Jeffrey Pomerantz

John Morris

Ira Kharasch

Greg Demo

PACHULSKI STANG ZIEHL & JONES LLP

10100 Santa Monica Blvd., 13th Floor

Los Angeles, CA 90067

Email: jpomerantz@pszjlaw.com

Email: jmorris@pszjlaw.com

Email: ikharasch@pszjlaw.com

Email: gdemo@pszjlaw.com

/s/ Bryan C. Assink

Bryan C. Assink

I. DEFINITIONS

1. For purpose of interpreting and determining the scope of the discovery requests made herein, the terms shall be given their most expansive and inclusive interpretations unless otherwise specifically limited by the language of an individual request. This includes, without limitation, the following:
 - (a) construing the singular form of the word to include the plural and the plural form of the word to include the singular; the words “and” and “or” shall be both conjunctive and disjunctive as necessary to make the request inclusive rather than exclusive; the word “all” means “any and all;” the word “including” means “including without limitation;”
 - (b) construing the masculine to include the feminine and vice versa; and
 - (c) construing any masculine or feminine pronoun to include “it” where appropriate.
2. The term “Communication(s)” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise) by any means, including but not limited to any meeting, conversation, discussion, conference, correspondence, message, or other written or oral transmission, exchange, or transfer of information in any form between two or more persons, including in person or by telephone, facsimile, telegraph, telex, electronic mail or other medium. The term also includes any Document transmitted or exchanged during such transmittal of information.
3. The term “Document(s)” refers to:
 - (a) all handwritten, typed, or printed matter of any kind, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copies or otherwise, including, without limitation, agreements, correspondence, forecasts, memoranda, e-mails, notes, jottings, speeches, press releases, diaries, examinations, statistics, letters, telegrams, minutes, time records, payroll records, expense records, contracts, reports, studies, training manuals, canceled checks, statements, receipts, delivery tickets, returns, summaries, work orders, pamphlets, books, prospectuses, statement of operations, inter-office and intra-office communications, internal and external audit reports, internal and external accounting reports, offers, notations of any sort of conversations, telephone calls, meetings, or other communications, bulletins, printed matter, computer print-outs, teletypes, invoices, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing;
 - (b) graphic or aural records of representations of any kind, including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures; and

- (c) electronic, mechanical or electronic records or representations of any kind, including, without limitation, tapes, cassettes, digital images, digital videos, videotapes, audiotapes, laser disks, disks (including CD-ROM disks), plans or other representations of anything concerning, describing, referring or relating, directly or indirectly, in whole or in part, to the subject matter of the discovery request at issue.
4. The words or phrases “relate to,” “relating to,” “concern,” “concerning,” “reflect,” “comprise,” “evidence,” “memorialize,” “constitute,” “describe,” “reflecting,” “regarding,” “refer to,” or “referring to” mean, without limitation, the following: effect, concern, refer to, reflect, evidence, display, contain, show, prove, encompass, support, demonstrate, involve, and/or include, in any way legally, logically, or factually connected to the matter referred to, or have a tendency to prove or disprove the matter referred to.
 5. As used herein, the term “Asset Sales” shall mean and refer to the sale of any assets held by the Debtor and/or held by any entity the Debtor directly or indirectly controls, including any and all Debtor affiliates and/or subsidiaries owned or controlled by the Debtor, that have been conducted during the course of the Bankruptcy Case.
 6. As used herein, the term “Bankruptcy Case” shall mean and refer to the above-captioned chapter 11 case of Highland Capital Management, L.P.
 7. As used herein, the term “Debtor” shall mean and refer to the Debtor in the above-captioned Bankruptcy Case, Highland Capital Management, L.P., and any of its respective agents and representatives or any person acting or purporting to act on their behalf.
 8. As used herein, the term “Plan” shall mean and refer to the *Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.* [Docket No. 1472] (as amended or modified, the “Plan”) filed by the Debtor in the Bankruptcy Case.
 9. As used herein, “Person” shall mean and refer to any individual, partnership, corporation, trust, estate, cooperative, association, government, governmental subdivision, or agency, or entity.
 10. The terms “Identify,” “identification,” “name,” or “describe” when used in reference to a natural person, mean to state his or her full name if known, his or her present or last known home and business address and telephone numbers, his or her present or last known position and business affiliation, and his or her positions and affiliations in business.
 11. “Identify,” “identification,” “name,” or “describe” when referring to documents, means to give, to the extent known the following information: (a) type of document; (b) the general subject matter; (c) the date of the document; (d) the authors, addressees, and recipients; (e) the location of the document; (f) the identity of the person who has custody of the document; and (g) whether the document has been destroyed, and if so, the (i) the date of the destruction; (ii) the reason for its destruction; and (iii) the identity of the person who destroyed it.

12. Unless otherwise specified, the applicable time period for these Discovery Requests shall be from October 16, 2019 to present.

II. INSTRUCTIONS

1. If the same person, document, or other item is required to be identified in your answer to two or more interrogatories, it is sufficient to identify it in your answer to the first interrogatory and thereafter to refer to that answer in response to call subsequent interrogatories calling for identification of the same person, document, or other item.

2. If any communication or document required to be identified in response to these Interrogatories and/or Requests for Production of Documents is claimed to be privileged, such communication or document must be identified within a privilege log, which shall be produced contemporaneously with the non-privileged documents responsive to these Requests, and which privilege log shall identify each such communication or document, to the extent applicable, by giving a description of such communication or document, the title, date of its creation, subject matter, author, addressee, where it was made or created, persons to whom copies were furnished and to whom the substance of the documents was communicated at any time after its creation, and the ground(s) for the privilege claim.

3. When producing documents pursuant hereto, copies may be produced in lieu of originals. You are required to produce the documents as they are kept in the usual course of business or to organize and label them to correspond with each category in these requests.

4. If any documents requested herein have been lost or destroyed, the documents so lost or destroyed shall be identified by author, date, and subject matter. In addition, the date of disposal, the manner of disposal, the reason for disposal, the person authorizing disposal, and the person disposing of the documents shall be identified.

III. DUTY TO SUPPLEMENT

Pursuant to Rule 26(e)(1) of the Federal Rules of Civil Procedure, you are requested to timely supplement your responses to these discovery requests if you learn that a response is in some material respect incorrect and if the additional or corrective material had not otherwise been made known during the discovery process or in writing.

IV. REQUEST FOR PRODUCTION OF DOCUMENTS TO THE DEBTOR

REQUEST FOR PRODUCTION NO. 1: Produce all marketing materials prepared for the sale of any of the assets held by the Debtor and/or held by any entity the Debtor directly or indirectly controls, including any and all Debtor affiliates and/or subsidiaries owned or controlled by the Debtor, that have been conducted during the course of the Bankruptcy Case. This request includes, without limitation, all marketing materials prepared in connection with the following transactions: (i) the sale of life settlement policies held by Highland Multi-Strategy Credit Fund, LP ("Multi-Strat"); (ii) the sale of the "Omnimax" asset held by Multi-Strat; (iii) the sale of SSP Holdings, a subsidiary of, or affiliate of, Trussway; (iv) any other sale of assets held by Multi-Strat; and (v) any other sale of assets owned or held by a subsidiary of the Debtor.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Produce copies of the data room index or index of due diligence materials provided to purchasers or prospective purchasers involved in the Asset Sales.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Produce copies of any Non-Disclosure Agreement ("NDA") or Confidentiality Agreement ("CA") executed in conjunction with parties looking at the Asset Sales.

RESPONSE:

REQUEST FOR PRODUCTION NO. 4: Produce a list of what documents and/or information were distributed to any person or entity in any initial solicitation of the Asset Sales.

RESPONSE:

REQUEST FOR PRODUCTION NO. 5: Produce a list of persons and/or entities which expressed any interest in the Asset Sales.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: Produce a list of follow up materials sent to any person or entity after an expression of interest made by such party, and, if NDA's and CA's were required, upon the execution of the NDA and CA.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7: Produce all documents and/or communications exchanged by and between (i) the Debtor and (ii) potential buyers, or the ultimate buyer, in the Asset Sales during the due diligence, negotiation stage, contract execution and through closing of any Asset Sales.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8: Produce copies of any sales contracts for the Asset Sales.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9: Produce copies of any closing documents for the Asset Sales.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10: Produce copies a Flow of Funds statement for each of the Asset Sales.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11: Produce copies of any brokerage agreement related to any of the Asset Sales.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12: Produce a copy of any employment agreement or engagement agreement by and between Mr. Seery and the Debtor and any amendments thereto.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13: Produce a copy of the engagement agreement by and between Pachulski Stang Ziehl & Jones LLP ("Pachulski") and the Debtor and any amendments thereto.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14: Produce a copy of any proposed engagement agreement (draft or final) by and between the Debtor and Mr. Seery if the proposed Plan is confirmed.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15: Produce a copy of any proposed engagement agreement (draft or final) by and between Pachulski and the Debtor if the proposed Plan is confirmed.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16: Produce a copy of any proposed brokerage agreement (draft or final) by and between the Debtor and any asset broker if the proposed Plan is confirmed.

RESPONSE:

D. Michael Lynn
State Bar I.D. No. 12736500
John Y. Bonds, III
State Bar I.D. No. 02589100
Clay M. Taylor
State Bar I.D. No. 24033261
Bryan C. Assink
State Bar I.D. No. 24089009
BONDS ELLIS EPPICH SCHAFFER JONES LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
(817) 405-6900 telephone
(817) 405-6902 facsimile

ATTORNEYS FOR JAMES DONDERO

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	
HIGHLAND CAPITAL MANAGEMENT,	§	Case No. 19-34054
L.P.,	§	
	§	
Debtor.	§	Chapter 11

**NOTICE OF ISSUANCE OF SUBPOENA TO TESTIFY AT A HEARING
OR TRIAL IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)**

PLEASE TAKE NOTICE that on January 21, 2021, pursuant to Rule 45 of the Federal Rules of Civil Procedure, made applicable to this proceeding by Rule 9016 of the Federal Rules of Bankruptcy Procedure, Mr. James Dondero, by and through his attorneys, will serve a Subpoena to Appear and Testify at a Hearing or Trial in a Bankruptcy Case (or Adversary Proceeding) (the “Subpoena”) in the above-captioned case on Mr. Jean Paul Sevilla. A copy of the Subpoena is attached as Exhibit 1.

Dated: January 21, 2021

Respectfully submitted,

/s/ Bryan C. Assink

D. Michael Lynn
State Bar I.D. No. 12736500
John Y. Bonds, III
State Bar I.D. No. 02589100
Clay M. Taylor
State Bar I.D. No. 24033261
Bryan C. Assink
State Bar I.D. No. 24089009
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Email: john@bondsellis.com
Email: clay.taylor@bondsellis.com
Email: bryan.assink@bondsellis.com

ATTORNEYS FOR JAMES DONDERO

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on January 21, 2021, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all parties requesting or consenting to such service in this case, including counsel for Mr. Sevilla as listed below.

David Neier
Winston & Strawn LLP
200 Park Avenue
New York, NY 10166-4193
Email: DNeier@winston.com

/s/ Bryan C. Assink

Bryan C. Assink

UNITED STATES BANKRUPTCY COURT

Northern

District of Texas

In re Highland Capital Management, L.P.

Debtor

Case No. 19-34054

(Complete if issued in an adversary proceeding)

Chapter 11

Plaintiff

v.

Adv. Proc. No.

Defendant

SUBPOENA TO APPEAR AND TESTIFY AT A HEARING OR TRIAL IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Jean Paul Sevilla

(Name of person to whom the subpoena is directed)

☒ **YOU ARE COMMANDED** to appear in the United States Bankruptcy Court at the time, date, and place set forth below to testify at a hearing or trial in this bankruptcy case (or adversary proceeding). When you arrive, you must remain at the court until the judge or a court official allows you to leave.

PLACE 1100 Commerce Street, 14th Floor

Dallas, TX 75242

(The hearing will occur remotely via WebEx - details will be provided or can be accessed at www.txnb.uscourts.gov)

COURTROOM 1

DATE AND TIME

January 26, 2021 at 9:30 a.m.**

You must also bring with you the following documents, electronically stored information, or objects (leave blank if not applicable):
(**and continuing through January 27-28, if necessary)

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 1/21/21

CLERK OF COURT

OR

/s/ Bryan C. Assink

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party)

James Dondoro

, who issues or requests this subpoena, are:

Bryan C. Assink, Bonds Ellis Eppich Schafer Jones LLP, 420 Throckmorton Street, Suite 1000, Fort Worth, TX 76102; email: bryan.assink@bondsellis.com; tel: 817-779-4297

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT 1

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (*name of individual and title, if any*): _____
on (*date*) _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on (*date*) _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true and correct.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information concerning attempted service, etc.:

002779

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...
(g) **Contempt.** The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

PACHULSKI STANG ZIEHL & JONES LLP
 Jeffrey N. Pomerantz (CA Bar No.143717) (*admitted pro hac vice*)
 Ira D. Kharasch (CA Bar No. 109084) (*admitted pro hac vice*)
 Gregory V. Demo (NY Bar 5371992) (*admitted pro hac vice*)
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Counsel for the Debtor and Debtor in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE NORTHERN DISTRICT OF TEXAS
 DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,¹

Debtor.

§
 § Chapter 11
 §
 § Case No. 19-34054-sgj11
 §
 §

Objection Deadline: February 9, 2021 at 4:00 p.m. (ET)
Hearing Date: Scheduled only if necessary

**FIFTEENTH MONTHLY APPLICATION FOR COMPENSATION
 AND REIMBURSEMENT OF EXPENSES OF PACHULSKI STANG
 ZIEHL & JONES LLP AS COUNSEL TO THE DEBTOR FOR
 THE PERIOD FROM DECEMBER 1, 2020 THROUGH DECEMBER 31, 2020**

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, I



Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional Services to:	Debtor and Debtor in Possession
Date of Retention:	October 16, 2019 by Order entered December 2, 2019
Period for which Compensation and Reimbursement is Sought:	December 1, 2020 - December 31, 2020
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$1,046,024.00
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$4,130.90

This is a: ☒ monthly ☐ interim ☐ final application.

The total time expended for preparation of this monthly fee application is approximately 5.0 hours and the corresponding compensation requested is approximately \$3,500.00.

PRIOR MONTHLY APPLICATIONS FILED

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses
12/11/19	10.16.19 – 10.31.19	\$ 383,583.75	\$ 9,958.84	\$ 383,583.75	\$ 9,958.84
12/30/19	11.01.19 – 11.30.19	\$ 798,767.50	\$26,317.71	\$ 798,767.50	\$26,317.71
01/24/20	12.01.19 – 12.31.19	\$ 589,730.75	\$26,266.80	\$ 589,730.75	\$26,266.80
02/20/20	01.01.20 – 01.31.20	\$ 898,094.25	\$28,854.75	\$ 898,094.25	\$28,854.75
03/19/20	02.01.20 – 02.29.20	\$ 941,043.50	\$ 8,092.94	\$ 941,043.50	\$ 8,092.94
04/14/20	03.01.20 – 03.31.20	\$1,222,801.25	\$18,747.77	\$1,222,801.25	\$18,747.77
05/21/20	04.01.20 – 04.30.20	\$1,113,522.50	\$ 3,437.28	\$1,113,522.50	\$ 3,437.28
06/23/20	05.01.20 – 05.31.20	\$ 803,509.50	\$ 4,372.94	\$ 803,509.50	\$ 4,372.94
07/20/20	06.01.20 – 06.30.20	\$ 818,786.50	\$ 3,205.81	\$ 818,786.50	\$ 3,205.81
08/11/20	07.01.20 – 07.31.20	\$ 739,976.00	\$ 1,189.12	\$ 739,976.00	\$ 1,189.12
09/24/20	08.01.20 – 08.31.20	\$ 672,815.00	\$ 3,428.14	\$ 672,815.00	\$ 3,428.14
10/21/20	09.01.20 – 09.30.20	\$ 828,193.00	\$ 7,707.11	\$ 828,193.00	\$ 7,707.11
11/20/20	10.01.20 – 10.31.20	\$1,119,675.50	\$19,132.28	\$1,119,675.50	\$19,132.28
12/07/20	11.01.20 – 11.30.20	\$ 759,428.00	\$ 1,672.80	\$ 759,428.00	\$ 1,672.80

PSZ&J PROFESSIONALS

Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Richard M. Pachulski	Partner 1983; member CA Bar 1979	1,445.00	9.40	\$13,583.00
Robert J. Feinstein	Partner 2001; Member NY Bar 1982	1,245.00	15.70	\$19,546.50
Ira D. Kharasch	Partner 1987; Member CA Bar 1982; Member NY Bar 2011	1,145.00	111.30	\$127,438.50
Judith Elkin	Of Counsel 2020; Member TX Bar 1982; Member NY Bar 2004	1100.00	23.70	\$26,070.00
John A. Morris	Partner 2008; Member NY Bar 1991	1,075.00	192.40	\$206,830.00
Jeffrey N. Pomerantz	Partner 1995; Member CA Bar 1989	1,075.00	114.50	\$123,087.50
Karen B. Dine	Of Counsel 2020; Member NY Bar 1994	1075.00	28.20	\$30,315.00
Iain A.W. Nasatir	Partner 1999; Member NY Bar 1983; Member CA Bar 1990	1025.00	2.30	\$2,357.50
Mary F. Caloway	Of Counsel 2020; Member DE Bar 1990	995.00	7.30	\$7,263.50
Harry D. Hochman	Of Counsel 2004; Member of CA Bar 1987	950.00	3.10	\$2,945.00
James E. O'Neill	Partner 2005; Member PA Bar 1985; Member DE Bar 2001	925.00	27.90	\$25,807.50
Joshua M. Fried	Partner 2006; Member CA Bar 1995; Member NY Bar 1999	925.00	118.80	\$109,890.00
Gabriel I. Glazer	Partner 2014; Member CA Bar 2006	895.00	47.00	\$42,065.00
Beth E. Levine	Of Counsel 2002; Member NY Bar 1992	825.00	7.80	\$6,435.00
Elissa A. Wagner	Of Counsel 2009; Member CA Bar 2001; Member AZ Bar 2009	825.00	11.00	\$9,075.00
Gregory V. Demo	Of Counsel 2019; Member IL Bar 2008; Member NY Bar 2015	825.00	226.00	\$186,450.00
Hayley R. Winograd	Associate 2020; Member NY Bar 2018	625.00	113.60	\$71,000.00
Karina K. Yee	Paralegal	425.00	18.10	\$7,692.50
La Asia S. Canty	Paralegal	425.00	13.60	\$5,780.00
Patricia J. Jeffries	Paralegal	425.00	12.50	\$5,312.50

Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Beatrice M. Koveleski	Case Management Assistant	350.00	4.00	\$1,400.00
Karen S. Neil	Case Management Assistant	350.00	2.00	\$700.00
Sheryle L. Pitman	Case Management Assistant	350.00	42.80	\$14,980.00

Grand Total: \$1,046,024.00

Total Hours: 1153.00

Blended Rate: \$907.22

COMPENSATION BY CATEGORY

Project Categories	Total Hours	Total Fees
Appeals	11.80	\$ 10,265.00
Asset Analysis/ Recovery	79.00	\$ 75,881.00
Asset Disposition	0.40	\$ 444.00
Bankruptcy Litigation	562.10	\$526,686.00
Case Administration	112.40	\$ 67,737.00
Claims Administration/ Objections	132.60	\$122,978.50
Compensation Professionals	30.20	\$ 22,270.00
Compensation Professionals/ Other	7.00	\$ 5,265.00
Employee Benefits/ Pension	74.00	\$ 73,431.00
Executory Contracts	9.40	\$ 8,035.00
Financial Filings	0.40	\$ 370.00
General Business Advice	34.30	\$ 35,254.50
General Creditors' Committee	6.30	\$ 6,287.50
Mediation	13.00	\$ 14,110.00
Plan & Disclosure Statement	63.10	\$ 60,220.50
Retention of Professionals/ Others	6.00	\$ 5,005.00
Stay Litigation	11.00	\$ 11,784.00
Total	1,153.00	\$1,046,024.00

EXPENSE SUMMARY

Expense Category	Service Provider (if applicable)	Total Expenses
Conference Call	AT&T, CourtCall, Loop Up	\$1,701.26
Delivery/ Courier Service	Advita	\$ 7.50
Federal Express		\$ 78.66
Lexis/Nexis – Legal Research		\$ 520.88
Pacer – Court Research		\$ 527.90
Postage		\$ 101.00
Reproduction Expense		\$ 464.80
Reproduction/ Scan Copy		\$ 728.90
Total		\$4,130.90

PACHULSKI STANG ZIEHL & JONES LLP
Jeffrey N. Pomerantz (CA Bar No.143717) (*admitted pro hac vice*)
Ira D. Kharasch (CA Bar No. 109084) (*admitted pro hac vice*)
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Fax: (972) 755-7110

Counsel for the Debtor and Debtor in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

<p>In re:</p> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.,¹</p> <p style="text-align: center;">Debtor.</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Chapter 11</p> <p>Case No. 19-34054-sgj11</p>
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Objection Deadline: February 9, 2021 at 4:00 p.m. (ET)
Hearing Date: Scheduled only if necessary

**FIFTEENTH MONTHLY APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF PACHULSKI STANG
ZIEHL & JONES LLP AS COUNSEL TO THE DEBTOR FOR
THE PERIOD FROM DECEMBER 1, 2020 THROUGH DECEMBER 31, 2020**

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

Pursuant to sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (collectively, the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (collectively, the “LBR”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 141] (the “Administrative Order”), Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”), counsel for the above-captioned debtor and debtor in possession (the “Debtor”) hereby submits its *Fifteenth Monthly Application for Compensation and for Reimbursement of Expenses for the Period from December 1, 2020 through December 31, 2020* (the “Application”).

By this Application, PSZ&J seeks (i) a monthly interim allowance of compensation in the amount of \$1,046,024.00 and actual and necessary expenses in the amount of \$4,130.90 for a total allowance of \$1,050,154.90 and (ii) payment of \$836,819.20 (80% of the allowed fees pursuant to the Administrative Order) and reimbursement of \$4,130.90 (100% of the allowed expenses pursuant to the Administrative Order) for a total payment of \$840,950.10 for the period December 1, 2020 through December 31, 2020 (the “Interim Period”). In support of this Application, PSZ&J respectfully represents as follows:

Background

1. On October 16, 2019 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Delaware Court”). The Debtor has continued in the

possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this chapter 11 case.

2. On October 29, 2019, the Official Committee of Unsecured Creditors (the “Committee”) was appointed by the U.S. Trustee in the Delaware Court.

3. On November 14, 2019, the Delaware Court entered the Administrative Order authorizing certain professionals and members of any official committee (collectively referred to hereafter as “Professionals”) to submit monthly applications for interim compensation and reimbursement of expenses pursuant to the procedures specified therein. The Administrative Order provides, among other things, that (i) a Professional may submit monthly fee applications and (ii) if no objections are made within twenty-one (21) days after service of the monthly fee application, the Debtor is authorized to pay the Professional eighty percent (80%) of its requested fees and one hundred percent (100%) of its requested expenses. The Administrative Order further provides that, beginning with the period ending December 31, 2019, and at three-month intervals thereafter—or such other intervals convenient to the Court—each Professional may file an interim application with seeking Court-approval and allowance of the amounts sought in the Professional’s monthly fee applications for that period. The Administrative Order further provides that all fees and expenses paid during the pendency of the Debtor’s case are on an interim basis until final allowance by the Court.

4. On December 4, 2019, the Delaware Court entered an Order [Docket No. 186] transferring venue of the Debtor’s bankruptcy case to this Court.

5. The retention of PSZ&J, as counsel to the Debtor, was approved effective as of October 16, 2019, by the Delaware Court's *Order Pursuant to Section 327(a) of the Bankruptcy Code, Rule 2014 of the Federal Rules of Bankruptcy Procedure and Local Rule 2014-1 Authorizing the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel for the Debtor and Debtor in Possession Nunc Pro Tunc to the Petition Date*, signed on December 2, 2019 [Docket No. 183] (the "Retention Order"). The Retention Order authorized PSZ&J to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

**PSZ&J'S APPLICATION FOR COMPENSATION AND
FOR REIMBURSEMENT OF EXPENSES**

Compensation Paid and Its Source

6. All services for which PSZ&J requests compensation were performed for or on behalf of the Debtor. PSZ&J has received no payment and no promises for payment from any source other than the Debtor for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between PSZ&J and any other person other than the partners of PSZ&J for the sharing of compensation to be received for services rendered in this case.

7. PSZ&J had received payments from the Debtor during the year prior to the Petition Date in the amount of \$500,000, including the Debtor's filing fee for this case, in connection with the preparation of initial documents and the prepetition representation of the Debtor. PSZ&J is current as of the Petition Date and has completed its final reconciliation of prepetition fees and expenses (subject to any prepetition expenses that have not been received to

date). Any retainer balance remaining from the prepetition payments to PSZ&J will be credited to the Debtor and utilized as PSZ&J's retainer to apply to postpetition fees and expenses pursuant to the approved compensation procedures.

Fee Statements

8. The fee statements for the Interim Period are attached hereto as **Exhibit A**. These statements contain daily time logs describing the time spent by each attorney and paraprofessional during the Interim Period. To the best of PSZ&J's knowledge, this Application complies with sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules and the Administrative Order. PSZ&J's time reports are entered by or at the direction of the attorney or paralegal performing the described services. The time reports are organized on a daily basis. PSZ&J is particularly sensitive to issues of "lumping" and, unless time was spent in one time frame on a variety of different matters for a particular client, separate time entries are set forth in the time reports. PSZ&J's charges for its professional services are based upon the time, nature, extent and value of such services and the cost of comparable services other than in a case under the Bankruptcy Code. PSZ&J has reduced its charges related to any non-working travel time to fifty percent (50%) of PSZ&J's standard hourly rate. To the extent it is feasible, PSZ&J professionals attempt to work during travel.

Actual and Necessary Expenses

9. A summary of actual and necessary expenses incurred by PSZ&J for the Interim Period is attached hereto as part of **Exhibit A**. PSZ&J customarily charges \$0.10 per page for photocopying expenses related to cases, such as this, arising in Delaware. PSZ&J's

photocopying machines automatically record the number of copies made when the person that is doing the copying enters the client's account number into a device attached to the photocopier.

PSZ&J summarizes each client's photocopying charges on a daily basis.

10. PSZ&J charges \$0.25 per page for out-going facsimile transmissions.

There is no additional charge for long distance telephone calls on faxes. The charge for outgoing facsimile transmissions reflects PSZ&J's calculation of the actual costs incurred by PSZ&J for the machines, supplies and extra labor expenses associated with sending telecopies and is reasonable in relation to the amount charged by outside vendors who provide similar services.

PSZ&J does not charge the Debtor for the receipt of faxes in this case.

11. With respect to providers of on-line legal research services (e.g., LEXIS and WESTLAW), PSZ&J charges the standard usage rates these providers charge for computerized legal research. PSZ&J bills its clients the actual amounts charged by such services, with no premium. Any volume discount received by PSZ&J is passed on to the client.

12. PSZ&J believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, PSZ&J believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

Summary of Services Rendered

13. The names of the timekeepers of PSZ&J who have rendered professional services in this case during the Interim Period are set forth in the attached **Exhibit A**. PSZ&J, by

and through such persons, has prepared and assisted in the preparation of various motions and orders submitted to the Court for consideration, advised the Debtor on a regular basis with respect to various matters in connection with the Debtor's case, and performed all necessary professional services which are described and narrated in detail below. PSZ&J's efforts have been extensive due to the size and complexity of the Debtor's case.

Summary of Services by Project

14. The services rendered by PSZ&J during the Interim Period can be grouped into the categories set forth below. PSZ&J attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category. These services performed, by categories, are generally described below, with a more detailed identification of the actual services provided set forth on the attached **Exhibit A**. Exhibit A identifies the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation sought for each category.

A. Asset Analysis/ Recovery

15. Time billed to this category relates to the analysis of the Debtor's assets and issues relating to the distribution of assets of funds managed by the Debtor. During the Interim Period, the Firm, among other things, (i) analyzed and addressed issues relating to post-confirmation transitional services following plan confirmation; (ii) reviewed certain contracts and related termination issues regarding certain shared service agreements and analyzed issues

concerning the potential assumption/assignment or rejection of contracts pursuant to the Debtor's plan.; (iii) addressed numerous operational transitional issues in connection with the Debtor's proposed plan; (iv) drafted a motion to for Highland Multi Strategy Credit Fund L.P. to prepay a loan consistent with the existing protocols and addressed related issues in connection with this motion; and (v) reviewed various note documents and drafted demand letters for repayment

Fees: \$75,881.00 Hours: 79.00

B. Asset Disposition

16. During the Interim Period, the Firm addressed issues raised by a motion to restrict certain asset sale transactions filed by James Dondero.

Fees: \$444.00 Hours: .40

C. Appeals

17. During the Interim Period, the Firm, among other things: (i) reviewed documents in connection with the appeals filed by UBS and Dondero with respect to the order approving the compromise of controversy between the Debtor and the Redeemer Committee; (ii) prepared counter designations of records in connection therewith; (iii) addressed issues in connection with the Redeemer intervention on UBS appeal; and (iv) performed legal research in connection with the UBS appeal.

Fees: \$10,265.00 Hours: 11.80

D. Bankruptcy Litigation

18. During the Interim Period, the Firm, among other things: (i) addressed litigation issues relating to Daugherty's motions for relief from stay; (ii) prepared an opposition

to HarbourVest's 3018 motion with respect to its request for temporary allowance of its claim for plan voting purposes; (iii) prepared a motion to compromise the Debtor's controversies with HarbourVest pursuant Bankruptcy Rule 9019; (iv) prepared for and attended the hearing on Daugherty's motion for temporary allowance of his claim for plan voting purposes under Bankruptcy Rule 3018; (v) prepared responsive pleadings in connection with Dondero's opposition to the Debtor's motion to approve entry into subservicing agreements; (vi) prepared a complaint and related pleadings in support of the motion for a temporary restraining order against Dondero and attended the December 10, 2020, hearing in connection therewith; (vii) drafted pleadings in connection with a motion for contempt against Dondero for violation of a temporary restraining order (viii) performed research regarding mediation settlement issues and bankruptcy jurisdictional issues; (ix) prepared for and attended a hearing regarding the retention of sub-service providers; and (x) drafted discovery requests to NexPoint Advisors and related parties and responded to the motion by NexPoint Advisors and related entities to impose restrictions on the Debtor's ability to initiate sales by non-Debtor CLO vehicles.

Fees: \$526,686.00

Hours: 562.10

E. Case Administration

19. This category relates to work regarding administration of this case.

During the Interim Period, the Firm, among other things: (i) reviewed correspondences and pleadings and forwarded them to appropriate parties; (ii) maintained a memorandum of critical dates and drafted memoranda of pending core issues and activities; (iii) maintained service lists; (iv) conferred and corresponded with parties in interest regarding case status and administration

issues; (v) conducted regular calls with DSI concerning lease and contract assumption issues; and (vi) participated on regular internal status calls and calls with DSI regarding case issues, and pending matters.

Fees: \$67,737.00 Hours: 112.40

F. Claims Administration/ Objections

20. A significant amount of work PSZ&J performed during the Interim Period involved the continued review and analysis of the largest claims asserted against the Debtor's estate. During the Interim Period, the Firm, among other things: (i) performed legal research in connection with requests by multiple parties to temporarily allow claims under Bankruptcy Rule 3018 and drafted oppositions in connection therewith; (ii) reviewed and analyzed defenses to HarbourVest claims; (iii) conferred with counsel and addressed issues in connection with the Acis settlement order; (iv) researched issues in connection with the UBS Claims litigation issues; (v) prepared a revised order resolving the Debtor's second omnibus objection to claims; and (vi) reviewed and analyzed responses to filed Bankruptcy Rule 3018 motions.

Fees: \$122,978.50 Hours: 132.60

G. Compensation of Professionals

21. Time billed to this category relates to compensation of the Firm. During the Interim Period, the Firm (i) prepared its November fee statement, (ii) drafted its third interim fee application and related pleadings, and (iii) drafted certifications of counsel regarding prior monthly fee statements.

Fees: \$22,270.00 Hours: 30.20

H. Compensation of Professionals/ Others

22. Time billed to this category relates to compensation of estate professionals, other than the Firm. During the Interim Period, the Firm, among other things: (i) reviewed fee applications of estate professionals; (ii) assisted DSI with the preparation and filing of its monthly Staffing Reports and the Debtor's ordinary course professional report; (iii) prepared an omnibus notice of hearing on third interim fee applications; and (iv) addressed issues in connection with the Debtor's ordinary course professional report.

Fees: \$5,265.00

Hours: 7.00

I. Employee Benefits/ Pension

23. During the Interim Period, the Firm, among other things: (i) addressed issues in connection with employee bonuses; (ii) addressed employee claim issues and potential litigation in connection therewith; (iii) addressed an information request from Pension Benefit Guaranty Corp. in connection with confirmation of the plan; (iv) performed research and prepared a memorandum of employee claims and benefit issues; and (v) analyzed issues regarding post-confirmation labor services.

Fees: \$73,431.00

Hours: 74.00

J. Executory Contracts

24. During the Interim Period, the Firm addressed issues in connection with its office lease with the Debtor's landlord, reviewed and analyzed contracts and prepared a cure notice with respect to agreements to be assumed pursuant to the plan.

Fees: \$8,035.00

Hours: 9.40

K. Financial Filings

25. During the Interim Period, the Firm assisted DSI with the preparation and filing of the Debtor's monthly operating reports.

Fees: \$370.00

Hours: .40

L. General Business Advice

26. During the Interim Period, the Firm spent time preparing for and participating in weekly telephonic meetings with the Debtor's independent board of directors and also regularly communicated with members of the Board regarding a variety of general business matters, including claims reconciliation and objections, plan structure issues, and addressed insurance issues.

Fees: \$35,254.50

Hours: 34.30

M. General Creditors' Committee

27. During the Interim Period, the Firm conducted regular status and update calls with the Committee and its professionals concerning case status issues.

Fees: \$6,287.50

Hours: 6.30

N. Mediation

28. During the Interim Period, the Firm addressed issues in connection with the need for further mediation regarding UBS and participated in calls with the mediators regarding related issues.

Fees: \$14,110.00

Hours: 13.00

O. Plan & Disclosure Statement

29. Time billed to this category relates to efforts in connection with confirmation of the Debtor's plan of reorganization following the Court's approval of the Disclosure Statement on November 23, 2020. During the Interim Period, the Firm, among other things, (i) negotiated with the Committee regarding issues relating to plan structure and implementation; (ii) reviewed and analyzed a motion to estimate claims for purposes of voting on the plan; (iii) performed research in connection with various plan issues; (iv) reviewed and revised a claimant trust agreement, and other plan documents related to the plan supplement; and (v) addressed various issues in connection with filed Bankruptcy Rule 3018 estimation motions.

Fees: \$60,220.50

Hours: 63.10

P. Retention of Professionals/ Others

30. Time billed to this category relates to the retention of estate professionals other than the Firm. During the Interim Period, the Firm, among other things, conferred with counsel regarding the retention of CLO counsel, reviewed engagement letters and assisted with the filing of additional disclosures for ordinary course professionals.

Fees: \$5,005.00

Hours: 6.00

Q. Stay Litigation

31. During the Interim Period, the Firm reviewed and analyzed Daugherty's relief from stay motion, researched issues in connection therewith, and attended the stay relief hearing conducted on December 17, 2020.

Fees: \$11,748.00

Hours: 11.00

Valuation of Services

32. Attorneys and paraprofessionals of PSZ&J expended a total 1,153.00 hours in connection with their representation of the Committee during the Interim Period, as follows:

Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Richard M. Pachulski	Partner 1983; member CA Bar 1979	1,445.00	9.40	\$13,583.00
Robert J. Feinstein	Partner 2001; Member NY Bar 1982	1,245.00	15.70	\$19,546.50
Ira D. Kharasch	Partner 1987; Member CA Bar 1982; Member NY Bar 2011	1,145.00	111.30	\$127,438.50
Judith Elkin	Of Counsel 2020; Member TX Bar 1982; Member NY Bar 2004	1100.00	23.70	\$26,070.00
John A. Morris	Partner 2008; Member NY Bar 1991	1,075.00	192.40	\$206,830.00
Jeffrey N. Pomerantz	Partner 1995; Member CA Bar 1989	1,075.00	114.50	\$123,087.50
Karen B. Dine	Of Counsel 2020; Member NY Bar 1994	1075.00	28.20	\$30,315.00
Iain A.W. Nasatir	Partner 1999; Member NY Bar 1983; Member CA Bar 1990	1025.00	2.30	\$2,357.50
Mary F. Caloway	Of Counsel 2020; Member DE Bar 1990	995.00	7.30	\$7,263.50
Harry D. Hochman	Of Counsel 2004; Member of CA Bar 1987	950.00	3.10	\$2,945.00
James E. O'Neill	Partner 2005; Member PA Bar 1985; Member DE Bar 2001	925.00	27.90	\$25,807.50
Joshua M. Fried	Partner 2006; Member CA Bar 1995; Member NY Bar 1999	925.00	118.80	\$109,890.00
Gabriel I. Glazer	Partner 2014; Member CA Bar 2006	895.00	47.00	\$42,065.00
Beth E. Levine	Of Counsel 2002; Member NY Bar 1992	825.00	7.80	\$6,435.00
Elissa A. Wagner	Of Counsel 2009; Member CA Bar 2001; Member AZ Bar 2009	825.00	11.00	\$9,075.00

Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Gregory V. Demo	Of Counsel 2019; Member IL Bar 2008; Member NY Bar 2015	825.00	226.00	\$186,450.00
Hayley R. Winograd	Associate 2020; Member NY Bar 2018	625.00	113.60	\$71,000.00
Karina K. Yee	Paralegal	425.00	18.10	\$7,692.50
La Asia S. Canty	Paralegal	425.00	13.60	\$5,780.00
Patricia J. Jeffries	Paralegal	425.00	12.50	\$5,312.50
Beatrice M. Koveleski	Case Management Assistant	350.00	4.00	\$1,400.00
Karen S. Neil	Case Management Assistant	350.00	2.00	\$700.00
Sheryle L. Pitman	Case Management Assistant	350.00	42.80	\$14,980.00

Grand Total: \$1,046,024.00
Total Hours: 1153.00
Blended Rate: \$907.22

33. The nature of work performed by these persons is fully set forth in **Exhibit A** attached hereto. These are PSZ&J’s normal hourly rates for work of this character. The reasonable value of the services rendered by PSZ&J for the Debtor during the Interim Period is \$1,046,024.00.

34. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by PSZ&J is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, PSZ&J has reviewed the requirements of the Administrative Order and the *Guidelines for Reviewing Applications for Compensation and Expense Reimbursement of Professionals*, effective January 1, 2001 (the “Guidelines”) and believes that this Application complies with such Order and Guidelines.

WHEREFORE, PSZ&J respectfully requests that, for the period of December 1, 2020 through December 31, 2020, (i) an interim allowance be made to PSZ&J for compensation in the amount \$1,046,024.00 and actual and necessary expenses in the amount of \$4,130.90 for a total allowance of \$1,050,154.90 and (ii) payment of \$836,819.20 (80% of the allowed fees pursuant to the Administrative Order) and reimbursement of \$4,130.90 (100% of the allowed expenses pursuant to the Administrative Order) for a total payment of \$840,950.10, and for such other and further relief as this Court may deem just and proper.

Dated: January 19, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Jeffrey N. Pomerantz

PACHULSKI STANG ZIEHL & JONES LLP

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*Counsel for the Debtor and
Debtor in Possession*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Application has been served electronically via the Court's CM/ECF system upon all parties appearing on the attached service list.

/s/ Jeffrey N. Pomerantz

Jeffrey N. Pomerantz

In re Highland Capital Management, L.P.

Case No. 19-34054-sgj11

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Counsel for the Debtor and Debtor in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹	§	
	§	Case No. 19-34054-sgj11
Debtor.	§	

CERTIFICATION OF JEFFREY N. POMERANTZ

Jeffrey N. Pomerantz, under penalty of perjury, certifies as follows:

1. I am a partner with the law firm of Pachulski Stang Ziehl & Jones LLP

("PSZ&J"). I make this certification in accordance with *Appendix F of the Local Bankruptcy*

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

Rules of the United States Bankruptcy Court for the Northern District of Texas (“Appendix F”)

regarding the contents of applications for compensation and expenses.

2. I have read the *Fifteenth Monthly Application for Compensation and for Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP as Counsel to the Debtor for the Period from December 1, 2020 through December 31, 2020* (the “Application”).

3. Pursuant to section I.G. of Appendix F, I hereby certify that, to the best of my knowledge, information, and belief, formed after reasonable inquiry, that (a) the compensation and expense reimbursement sought in the Application is in conformity with Appendix F, except as specifically noted in the Application, and (b) the compensation and expense reimbursement requested are billed at rates in accordance with practices no less favorable than those customarily employed by PSZ&J and generally accepted by PSZ&J’s clients.

4. I have reviewed the requirements of the *Guidelines for Reviewing Applications for Compensation and Expense Reimbursement of Professionals* effective January 1, 2001 (the “Guidelines”) and I believe that the Application complies with such Guidelines

Dated: January 19, 2021

/s/ Jeffrey N. Pomerantz
Jeffrey N. Pomerantz

Exhibit A

December 2020 Invoice

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

December 31, 2020

Invoice 126769

Client 36027

Matter 00002

JNP

Board of Directors
Highland Capital Management LP
300 Crescent Court ste. 700
Dallas, TX 75201

RE: Postpetition

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/2020

FEES	\$1,046,024.00
EXPENSES	\$4,130.90
TOTAL CURRENT CHARGES	\$1,050,154.90
BALANCE FORWARD	\$2,198,785.68
LAST PAYMENT	\$2,198,785.68
TOTAL BALANCE DUE	\$1,050,154.90

Pachulski Stang Ziehl & Jones LLP
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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BEL	Levine, Beth E.	Counsel	825.00	7.80	\$6,435.00
BMK	Koveleski, Beatrice M.	Case Man. Asst.	350.00	4.00	\$1,400.00
EAW	Wagner, Elissa A.	Counsel	825.00	11.00	\$9,075.00
GIG	Glazer, Gabriel I.	Partner	895.00	47.00	\$42,065.00
GVD	Demo, Gregory Vincent	Counsel	825.00	226.00	\$186,450.00
HDH	Hochman, Harry D.	Counsel	950.00	3.10	\$2,945.00
HRW	Winograd , Hayley R.	Associate	625.00	113.60	\$71,000.00
IAWN	Nasatir, Iain A. W.	Partner	1025.00	2.30	\$2,357.50
IDK	Kharasch, Ira D.	Partner	1145.00	111.30	\$127,438.50
JAM	Morris, John A.	Partner	1075.00	192.40	\$206,830.00
JE	Elkin, Judith	Counsel	1100.00	23.70	\$26,070.00
JEO	O'Neill, James E.	Partner	925.00	27.90	\$25,807.50
JMF	Fried, Joshua M.	Partner	925.00	118.80	\$109,890.00
JNP	Pomerantz, Jeffrey N.	Partner	1075.00	114.50	\$123,087.50
KBD	Dine, Karen B.	Counsel	1075.00	28.20	\$30,315.00
KKY	Yee, Karina K.	Paralegal	425.00	18.10	\$7,692.50
KSN	Neil, Karen S.	Case Man. Asst.	350.00	2.00	\$700.00
LSC	Canty, La Asia S.	Paralegal	425.00	13.60	\$5,780.00
MFC	Caloway, Mary F.	Counsel	995.00	7.30	\$7,263.50
PJJ	Jeffries, Patricia J.	Paralegal	425.00	12.50	\$5,312.50
RJF	Feinstein, Robert J.	Partner	1245.00	15.70	\$19,546.50
RMP	Pachulski, Richard M.	Partner	1445.00	9.40	\$13,583.00
SLP	Pitman, L. Sheryle	Case Man. Asst.	350.00	42.80	\$14,980.00
				1153.00	\$1,046,024.00

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	79.00	\$75,881.00
AD	Asset Disposition [B130]	0.40	\$444.00
AP	Appeals [B430]	11.80	\$10,265.00
BL	Bankruptcy Litigation [L430]	562.10	\$526,686.00
CA	Case Administration [B110]	112.40	\$67,737.00
CO	Claims Admin/Objections[B310]	132.60	\$122,978.50
CP	Compensation Prof. [B160]	30.20	\$22,270.00
CPO	Comp. of Prof./Others	7.00	\$5,265.00
EB	Employee Benefit/Pension-B220	74.00	\$73,431.00
EC	Executory Contracts [B185]	9.40	\$8,035.00
FF	Financial Filings [B110]	0.40	\$370.00
GB	General Business Advice [B410]	34.30	\$35,254.50
GC	General Creditors Comm. [B150]	6.30	\$6,287.50
M	Mediation	13.00	\$14,110.00
PD	Plan & Disclosure Stmt. [B320]	63.10	\$60,220.50
RPO	Ret. of Prof./Other	6.00	\$5,005.00
SL	Stay Litigation [B140]	11.00	\$11,784.00
		1153.00	\$1,046,024.00

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$1,701.26
Delivery/Courier Service	\$7.50
Federal Express [E108]	\$78.66
Lexis/Nexis- Legal Research [E	\$520.88
Pacer - Court Research	\$527.90
Postage [E108]	\$101.00
Reproduction Expense [E101]	\$464.80
Reproduction/ Scan Copy	\$728.90
	<hr/>
	\$4,130.90

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December 31, 2020

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
12/01/2020	IDK	AA	E-mails with G Demo, J. Pomerantz re draft letter to CEO on need for CLO specialist given recent issues, including review of same, and mine and J. Pomerantz's feedback (.3); E-mails with G Demo re CEO feedback to same and next steps (.1); Attend conference call with Wilmer Hale, DSI, G Demo, CEO on transition issues, CLOs, other (.7); E-mails with G Demo re same and need for memo on various new open issues re transitions (.3).	1.40	1145.00	\$1,603.00
12/01/2020	IDK	AA	E-mails with Wilmer Hale, G Demo on Wilmer's draft cease and desist to Nextpoint re CLO interference, including review of same, as well as J. Pomerantz feedback/changes to same (.3); Review of correspondence to CEO re same (.1).	0.40	1145.00	\$458.00
12/01/2020	IDK	AA	Review of correspondence with Surgent re termination notices on shared services.	0.10	1145.00	\$114.50
12/01/2020	IDK	AA	E-mails with attorneys re status/timing on sending out demands on Dondero p-notes, and need for call re same (.2); E-mails with DSI, G Demo re his draft demand letters, including review of same, and info needed from DSI (.3).	0.50	1145.00	\$572.50
12/01/2020	JNP	AA	Review draft email regarding retention of CLO counsel and provide comment.	0.10	1075.00	\$107.50
12/01/2020	JNP	AA	Review and comment on letter regarding CLOs.	0.20	1075.00	\$215.00
12/01/2020	GVD	AA	Review convertible note documents in advance of call (0.2); conference with HCMLP re director issues (0.5); conference with convertible note issue re potential conversion (0.5); draft demand letters re outstanding notes (0.9); conference with J. Romey re demand letters (0.4); review termination notices re shared service/sub-advisory agreements (0.2)	2.70	825.00	\$2,227.50
12/02/2020	IDK	AA	Review of correspondence with CEO on demand notes (.1); Review of correspondence with DSI, G Demo on revisions to demands re Dondero related P- Notes and relevant info (.2); Attend initial conference call with J. Pomerantz, J Morris on demand notes and other issues (.3); Telephone conference with G Demo and J. Pomerantz re same and next steps (.1); Attend 2d call on demand notes, today's employee call and call with CLO issuers (.8).	1.50	1145.00	\$1,717.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/02/2020	IDK	AA	E-mails with J Morris re his revised cease and desist letter to Nextbank re CLOs, including review of same, and where letter should come from, and other CLO issues.	0.30	1145.00	\$343.50
12/02/2020	IDK	AA	E-mails with J. Pomerantz re result of call with issuers of CLOs and next steps (.2).	0.20	1145.00	\$229.00
12/02/2020	JNP	AA	Review draft demand notes.	0.10	1075.00	\$107.50
12/02/2020	JNP	AA	Participate on call with J. Seery, T. Silva, Gregory V. Demo and CLO issuers counsel regarding status.	0.90	1075.00	\$967.50
12/02/2020	JNP	AA	Emails regarding finalizing letter regarding CLOs.	0.10	1075.00	\$107.50
12/02/2020	GVD	AA	Correspondence with J. Seery re demand letters (0.2); correspondence re status of purchase and sale agreement (0.1); correspondence re substitution of directors (0.1); revise demand letters re notes (0.4); conference with J. Romey re related entity financial statements (0.1); conference with F. Caruso re subservicer agreements (0.4); correspondence re assumption of lease (0.2); conference with J. Romey re transition issues (0.3)	1.80	825.00	\$1,485.00
12/03/2020	IDK	AA	Review of numerous correspondence re demand letters to Dondero and related entities liable on demand notes and related individuals working for same, including feedback from same counsels and from Waterhouse re notice requirements in demand notes.	0.40	1145.00	\$458.00
12/03/2020	IDK	AA	E-mail to G Demo re correspondence with CEO/UBS on paying off NextBank loan at Multi Strat, and consider next steps given potential objection by UBS.	0.20	1145.00	\$229.00
12/03/2020	JNP	AA	Review emails regarding demand notes.	0.10	1075.00	\$107.50
12/03/2020	JNP	AA	Review and respond to emails regarding demand notes.	0.10	1075.00	\$107.50
12/03/2020	GVD	AA	Conference with F. Caruso re transitional issues and asset monetizations (0.5); revise and send letters re payment of demand notes (0.9); multiple correspondence re CLO management agreements (0.3); conference with J. Bain re CLO management agreements (0.4); multiple correspondence re Cayman directors (0.2)	2.30	825.00	\$1,897.50
12/04/2020	IDK	AA	E-mails to G Demo, Wilmer Hale, internal legal, on draft of proposal to NextPoint re its acquisition of	0.30	1145.00	\$343.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			CLOs, including review of same, and revised per feedback.			
12/04/2020	JNP	AA	Review and comment on cease and desist letters and emails.	0.20	1075.00	\$215.00
12/05/2020	IDK	AA	Review and consider extensive memo from G Demo re feedback from Dechert firm on significant issues re transfer of CLO management to NextPoint, as well as memo to NextPoint re terms of potential deal re same.	0.40	1145.00	\$458.00
12/07/2020	IDK	AA	E-mails with G Demo and J. Pomerantz re Demo summary of discussions with NPA re CLO transition to NPA and concerns on asset sales prior to transfer and deal point issues, and consider same (.2); Review briefly E-mails with CEO, others re Dechert problems re representing Debtor on CLO issues and next steps (.1).	0.30	1145.00	\$343.50
12/07/2020	IDK	AA	Review of correspondence from NextPoint re its threat of filing injunction re CLOs (.1); Telephone conference with conference with J. Pomerantz and G Demo re how to respond to same (.2); Telephone conference with J. Pomerantz re same (.1).	0.40	1145.00	\$458.00
12/07/2020	GVD	AA	Conference with F. Caruso re asset issues (0.2); correspondence re potential agreement on convertible note purchase agreement (0.1); conference with WilmerHale re corporate governance issues (0.6); conference with J. Wright re potential CLO management agreement transfer (0.6); correspondence with group re conversation with J. Wright (0.4); conference with J. Seery re CLO management agreement issues (0.2); conference with J. Pomerantz and I. Kharasch re CLO management agreement issue (0.2); attend to issues re CLO management agreement transfer (0.2); correspondence with T. Silva re CLO management agreement transfer (0.1); review issues re Acis allocation of Maples fees (0.2)	2.80	825.00	\$2,310.00
12/08/2020	IDK	AA	E-mails with CEO and attorneys re Dechert problem re CLO issues, related Cayman issues and litigation specialty re same and need for other counsel for same, including various E-mails on potential alternatives, and feedback from potential firms.	0.30	1145.00	\$343.50
12/08/2020	IDK	AA	E-mails with CEO, others re CLO issuers request for call and status on their threat to initiate litigation vs Debtor (.1); E-mails with attorneys re CLO issuers just filed injunction papers re stopping trades at	0.40	1145.00	\$458.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			CLOs, including brief review of same and comments to same (.3).			
12/08/2020	JAM	AA	E-mail to J. Seery, J. Dubel, J. Pomerantz, G. Demo re: recovery of legal expenses incurred by the estate in connection with the resolution of Brown Rudnick dispute with CLOs (0.1).	0.10	1075.00	\$107.50
12/09/2020	IDK	AA	E-mails with CEO, others re correspondence with Sidley re extension to sue CLO Holdco.	0.10	1145.00	\$114.50
12/09/2020	IDK	AA	E-mails with J. Pomerantz re next steps in DSI Dec re transition issues, and consider (.2).	0.20	1145.00	\$229.00
12/09/2020	IDK	AA	E-mails and telephone conferences with G Demo on need for motion to pay off NextBank from Multi-Strat, and next steps and consider (.3); Telephone conference with G Demo re need for motion re CLOs and J Kim, other assistance on Dondero issues (.1); E-mails with J Elkin re same (.1).	0.50	1145.00	\$572.50
12/09/2020	MFC	AA	Emails from/to G. Demo and J. Romey regarding 363 motion.	0.10	995.00	\$99.50
12/09/2020	MFC	AA	Review operating protocols and loan information.	0.60	995.00	\$597.00
12/09/2020	MFC	AA	Draft motion for authority to prepay loan.	0.50	995.00	\$497.50
12/09/2020	MFC	AA	Call with G. Demo and J. Romey regarding motion to prepay loan.	0.40	995.00	\$398.00
12/09/2020	GVD	AA	Review issues re loan repayment	0.30	825.00	\$247.50
12/09/2020	GVD	AA	Conference with J. Romey and M. Caloway re loan repayment issues	0.40	825.00	\$330.00
12/10/2020	IDK	AA	Review and consider G Glazier extensive memo on demand note litigation and related Stern issues (.4); E-mails with G Glazer re same (.2); E-mails with J. Pomerantz re same (.1).	0.70	1145.00	\$801.50
12/10/2020	IDK	AA	E-mails with Caruso/DSI re status on transition issues re shared services (.1); E-mails with attorneys re same and need for role of Brad Sharp re transition Dec. (1).	0.20	1145.00	\$229.00
12/10/2020	MFC	AA	Drafting motion to prepay loan.	1.70	995.00	\$1,691.50
12/10/2020	MFC	AA	Call with F. Caruso regarding SEI contract issues.	0.40	995.00	\$398.00
12/10/2020	MFC	AA	Emails to F. Caruso regarding NAV and SEI contract issues.	0.20	995.00	\$199.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/10/2020	GVD	AA	Multiple conferences with counsel to CLO issuers re potential transfer and follow up re same	0.80	825.00	\$660.00
12/10/2020	GVD	AA	Conference with J. Romey re transition issues	0.20	825.00	\$165.00
12/10/2020	GVD	AA	Draft outline re transition issues	0.50	825.00	\$412.50
12/11/2020	IDK	AA	E-mails with G Demo re Stern issues on collection of AR and related Stern memo (.2); Review of correspondence with G Glazer re same on Stern analysis (.1).	0.30	1145.00	\$343.50
12/11/2020	IDK	AA	Review of correspondence from directors of HCLOF re its "concerns" on managed CLOs, including G Demo's correspondence with Wilmer Hale re need for answers to related questions (.2); E-mails with G Demo and J. Pomerantz re same (.1).	0.30	1145.00	\$343.50
12/11/2020	IDK	AA	Review and consider draft of motion to payoff NextBank loan at Multi Strat, including G Demo E-mail to re issues on same (.3); E-mail to G Demo re my extensive comments/changes to be made to same (.3).	0.60	1145.00	\$687.00
12/11/2020	IDK	AA	Review extensive correspondence from counsel to NPA/HCMFA re various new theories re demand letters, reimbursements, shared services, other.	0.20	1145.00	\$229.00
12/11/2020	MFC	AA	Revise motion to prepay loan.	0.30	995.00	\$298.50
12/11/2020	MFC	AA	Emails to/from J. Romey and G. Demo re motion to prepay loan.	0.20	995.00	\$199.00
12/11/2020	GVD	AA	Review and revise update list of transition items from F. Caruso	0.40	825.00	\$330.00
12/11/2020	GVD	AA	Review correspondence from Guernsey directors re meet and confer	0.20	825.00	\$165.00
12/11/2020	GVD	AA	Review motion re prepayment of loan	0.50	825.00	\$412.50
12/11/2020	GVD	AA	Conference with J. Seery, J. Romey, and HCMLP re potential asset transactions	0.60	825.00	\$495.00
12/11/2020	GVD	AA	Conference with J. Romey re follow up to asset transaction call	0.20	825.00	\$165.00
12/11/2020	GVD	AA	Conference with F. Caruso re status of transition items	0.20	825.00	\$165.00
12/12/2020	IDK	AA	E-mail to CEO re his feedback on HCMFA assertions/allegations on Debtor's attempt to collect on demand notes, shared services.	0.10	1145.00	\$114.50

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Highland Capital Management LP
36027 -00002

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/13/2020	IDK	AA	Numerous E-mails with attorneys re draft of response to extensive allegations by HCMFA re demand notes, shared services, including feedback/changes re same.	0.20	1145.00	\$229.00
12/14/2020	IDK	AA	E-mail to HCLCF/NPA in response to letter from same on breaches and demand notes.	0.10	1145.00	\$114.50
12/14/2020	JNP	AA	Review email from HCLOF regarding upcoming discussion with J. Seery to discuss status.	0.10	1075.00	\$107.50
12/14/2020	MFC	AA	Email to client regarding status of SEI agreement.	0.10	995.00	\$99.50
12/14/2020	GVD	AA	Conference with WilmerHale re corporate governance issues	0.40	825.00	\$330.00
12/14/2020	GVD	AA	Review issues re debt issuances	0.30	825.00	\$247.50
12/14/2020	GVD	AA	Conference with J. Romey re debt issues	0.30	825.00	\$247.50
12/15/2020	IDK	AA	E-mails with CLO Issuers counsels re their position on our response to NPA motion re CLOs and need for call (.2); Attend conference call with CLO issuers re transfer issues of management of CLOs and their communications with NPA (.6); Review of UCC joinder in our objection to CLO motion, including E-mails with Board re same (.2).	1.00	1145.00	\$1,145.00
12/15/2020	IDK	AA	E-mails with B Sharp, DSI, re status on transition issues/memo (.2); E-mails with Kasowitz re issues on getting core CLO documents to NPA re transition (.1).	0.30	1145.00	\$343.50
12/15/2020	IDK	AA	Review and consider revised motion to payoff NextBank loan at Multi-Strat (.2); E-mail to G Demo re my list of further modifications to same (.2); Review of further modified motion, along with E-mail to DSI re same for further facts needed, and DSI feedback (.2).	0.60	1145.00	\$687.00
12/15/2020	GVD	AA	Revise and circulate motion re prepayment of loan	2.30	825.00	\$1,897.50
12/15/2020	GVD	AA	Conference with F. Caruso re transition and contract issues	0.60	825.00	\$495.00
12/15/2020	GVD	AA	Correspondence re potential resolution of convertible note	0.10	825.00	\$82.50
12/16/2020	IDK	AA	E-mails with G Demo and DSI re CEO sign off on motion to prepay NextBank and next steps and further info for same.	0.20	1145.00	\$229.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/16/2020	IDK	AA	E-mails with CEO, G Demo re todays CLO Holdco demand for payment on Select notes, including review of same.	0.20	1145.00	\$229.00
12/16/2020	GVD	AA	Conference with K. Vela re convertible note	0.20	825.00	\$165.00
12/16/2020	GVD	AA	Conference re monetization of portfolio investments	0.50	825.00	\$412.50
12/16/2020	GVD	AA	Conference with J. Donohue re debt issues	0.10	825.00	\$82.50
12/16/2020	GVD	AA	Conference with F. Caruso re open transition items	0.20	825.00	\$165.00
12/16/2020	GVD	AA	Revise motion re prepayment of NexBank loan	0.60	825.00	\$495.00
12/16/2020	GVD	AA	Address issues re HCLOF interests	0.50	825.00	\$412.50
12/16/2020	GVD	AA	Conference with J. Romey re prepayment of NexBank loan	0.30	825.00	\$247.50
12/16/2020	GVD	AA	Conference with DSI re additional contract terminations	0.30	825.00	\$247.50
12/17/2020	IDK	AA	E-mails with CEO, DSI, others on FTI feedback on payments due from Select and protocol issues re same.	0.20	1145.00	\$229.00
12/17/2020	IDK	AA	E-mails with DSI re initial list of assumed contracts, including review of same, and need for call re same (.2).	0.20	1145.00	\$229.00
12/17/2020	JMF	AA	Review motion to prepay loan re protocols.	0.30	925.00	\$277.50
12/17/2020	GVD	AA	Conference with J. Romey re prepayment of NexBank loan	0.50	825.00	\$412.50
12/17/2020	GVD	AA	Revise and file NexBank prepayment motion	0.40	825.00	\$330.00
12/17/2020	GVD	AA	Draft additional notices of termination of shared services agreements	0.40	825.00	\$330.00
12/17/2020	GVD	AA	Draft note agreement re potential loan to Select Fund	0.60	825.00	\$495.00
12/17/2020	GVD	AA	Multiple calls re potential loan to Select Fund	0.30	825.00	\$247.50
12/17/2020	GVD	AA	Correspondence re potential sale transaction and next steps	0.20	825.00	\$165.00
12/17/2020	GVD	AA	Conference with T. Courneyor re potential sale transaction	0.20	825.00	\$165.00
12/17/2020	GVD	AA	Review issues re management of CLO contracts	0.20	825.00	\$165.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/17/2020	GVD	AA	Review timeline re transition issues	0.50	825.00	\$412.50
12/17/2020	GVD	AA	Conference with CLO issuers counsel re treatment of CLO management agreements	0.50	825.00	\$412.50
12/17/2020	GVD	AA	Conference with J. Romey re transition issues	0.40	825.00	\$330.00
12/18/2020	IDK	AA	Attend conference call with DSI, G Demo re numerous transition issues including contracts to assume/reject/defer (1.3); E-mail to DSI re its revised DEC on transition issues, including review of same (.3).	1.60	1145.00	\$1,832.00
12/18/2020	IDK	AA	E-mails with DSI, others on Dondero interference with cancellation of Moody's contract, including related E-mails with re same (.2); Telephone conference with J. Pomerantz re same (.1); E-mails with DSI and attorneys re need for call re same, and info needed for call (.2); Attend conference call with J. Pomerantz and G Demo re same and issues on same and next steps, and HarbourVest transfer issues (.3); Attend next conference call with DSI, attorneys re same on further facts (.3); Prep of draft letter to Moody's clarifying the Debtor's intentions on the contract, including NextPoint taking old contract (.4); Attend further conference call with CEO, J. Pomerantz, G Demo re general problem with Moody's/NextPoint, proposed draft letter and next steps (.3); E-mails with DSI re draft letter for DSI to send re same and coordination (.2).	2.00	1145.00	\$2,290.00
12/18/2020	IDK	AA	Telephone conference with Dondero counsel, J. Pomerantz, re Moody's and interference of Dondero (.2).	0.20	1145.00	\$229.00
12/18/2020	IDK	AA	E-mails with attorneys re Dondero related entities demand for payment from Select.	0.10	1145.00	\$114.50
12/18/2020	IDK	AA	E-mails with DSI, G Demo, J. Pomerantz re summary of proposed sale to Eagle Equity and release issues on same.	0.20	1145.00	\$229.00
12/18/2020	JNP	AA	Conference with Ira D. Kharasch and Gregory V. Demo regarding Moodys contract.	0.30	1075.00	\$322.50
12/18/2020	JNP	AA	Conference with Ira D. Kharasch, Gregory V. Demo and F. Caruso regarding employees.	0.30	1075.00	\$322.50
12/18/2020	JNP	AA	Conference with J. Seery, Ira D. Kharasch and Gregory V. Demo regarding Moodys.	0.30	1075.00	\$322.50
12/18/2020	JNP	AA	Conference with M. Lynn and Ira D. Kharasch	0.20	1075.00	\$215.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding Moodys issues.			
12/18/2020	JNP	AA	Email to and from Gregory V. Demo regarding Engle transaction.	0.10	1075.00	\$107.50
12/18/2020	GVD	AA	Review purchase agreement re potential transaction	1.10	825.00	\$907.50
12/18/2020	GVD	AA	Conference re portfolio company governance issues	0.50	825.00	\$412.50
12/18/2020	GVD	AA	Conference with DSI and J. Seery re convertible note agreement	0.50	825.00	\$412.50
12/18/2020	GVD	AA	Conference with F. Caruso re open transition issues	0.20	825.00	\$165.00
12/19/2020	JNP	AA	Conference with Gregory V. Demo regarding HCLOF.	0.10	1075.00	\$107.50
12/19/2020	JNP	AA	Review email from M. Lynn regarding Moodies and forward to J. Seery.	0.10	1075.00	\$107.50
12/20/2020	IDK	AA	E-mails with DSI, G Demo on p-note issues by Dondero entities vs Select, including quick review on same.	0.20	1145.00	\$229.00
12/20/2020	IDK	AA	Review and consider E-mails with J Morris, others re draft of complaint vs Dondero on demand notes and attachment remedy issues.	0.20	1145.00	\$229.00
12/20/2020	JNP	AA	Emails to and from Gregory V. Demo regarding call with HCLOF counsel.	0.10	1075.00	\$107.50
12/20/2020	GVD	AA	Review materials re potential debt equitization	0.20	825.00	\$165.00
12/21/2020	IDK	AA	E-mail to G Demo correspondence to CEO with draft loan note to Select and issues.	0.20	1145.00	\$229.00
12/21/2020	IDK	AA	Review and consider DSI analysis and summary of proposed Eagle Equity transaction.	0.30	1145.00	\$343.50
12/21/2020	IDK	AA	E-mails with DSI, others on rescheduling of transition issues call.	0.10	1145.00	\$114.50
12/21/2020	JNP	AA	Conference with Gregory V. Demo in preparation for call with M. Maloney regarding HCLOF.	0.10	1075.00	\$107.50
12/21/2020	JNP	AA	Conference with Gregory V. Demo and Alston & Bird regarding HCLOF related issues.	0.70	1075.00	\$752.50
12/21/2020	JNP	AA	Conference with Gregory V. Demo after call with Alston & Bird regarding HCLOF.	0.10	1075.00	\$107.50
12/21/2020	JNP	AA	Email to Gregory V. Demo regarding Multi Stat analysis.	0.10	1075.00	\$107.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/21/2020	GVD	AA	Conference with C. Baynard re portfolio company tax issues (0.4); conference with counsel to portfolio company re same (0.5)	0.90	825.00	\$742.50
12/21/2020	GVD	AA	Conference with F. Caruso re transition issues and next steps	0.40	825.00	\$330.00
12/21/2020	GVD	AA	Conference with J. Romey re transition issues and a/r collection	0.50	825.00	\$412.50
12/21/2020	GVD	AA	Attend to issues re payment of demand notes	0.30	825.00	\$247.50
12/22/2020	IDK	AA	Review and consider DSI revised/updated DEC on transition issues for ops prior to Effective Date, and after Effective Date (.3) ; attend conference call with DSI team, J. Pomerantz, G Demo, re transition issues to Effective Date, and post-Effective Date ops, current op issues (1.2) ; E-mails with J. Pomerantz and G Demo re coordination of call with CEO on transition (.1).	1.60	1145.00	\$1,832.00
12/22/2020	IDK	AA	Review of correspondence to Dondero counsel on payment re CLO Holdco notes	0.10	1145.00	\$114.50
12/22/2020	IDK	AA	E-mails with DSI, others on coordination of Eagle Equity issues (.1).	0.10	1145.00	\$114.50
12/22/2020	IDK	AA	E-mails with J. Pomerantz and G Demo re DSI DEC on Multi-Strat ownership/interests breakdown, including review of same (.2).	0.20	1145.00	\$229.00
12/22/2020	JNP	AA	Review DSI deck regarding transition issues in preparation for call.	0.20	1075.00	\$215.00
12/22/2020	JNP	AA	Conference with DSI, Ira D. Kharasch and Gregory V. Demo regarding transition issues.	1.20	1075.00	\$1,290.00
12/22/2020	JNP	AA	Review email and attachments regarding proposed transaction regarding Eagle Equity Advisors.	0.20	1075.00	\$215.00
12/22/2020	JNP	AA	Conference with DSI and Gregory V. Demo regarding Eagle Equity Advisors.	0.40	1075.00	\$430.00
12/22/2020	MFC	AA	Emails to/from F. Caruso and G. Demo regarding SEI contract status.	0.10	995.00	\$99.50
12/22/2020	GVD	AA	Correspondence with counsel to CLO Holdco re loan repayment issues	0.10	825.00	\$82.50
12/22/2020	GVD	AA	Attend to issues re J. Seery CIMA registration	0.10	825.00	\$82.50
12/22/2020	GVD	AA	Attend PSZJ/DSI call re transition items	1.20	825.00	\$990.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/22/2020	GVD	AA	Draft settlement agreement re convertible note issues	0.60	825.00	\$495.00
12/22/2020	GVD	AA	Attend to issues re transferring bank accounts	0.50	825.00	\$412.50
12/22/2020	GVD	AA	Conference with PSZJ and DSI re potential asset sale and release issues	0.40	825.00	\$330.00
12/23/2020	IDK	AA	Review of DSI power point on various transition and contract issues re operations before and after Effective Date (.2); Attend initial conference call with DSI team, others on transition issues (.2); Attend 2d conference call re same also with CEO (1.0).	1.40	1145.00	\$1,603.00
12/23/2020	IDK	AA	Review of correspondence to Wilmer Hale re open issues on MS (.1); Attend conference call with Wilmer Hale on MS issues and UBS (.6).	0.70	1145.00	\$801.50
12/23/2020	IDK	AA	Review of numerous correspondence re draft letter for CEO to send to various employees re shared services on denial of access and related Dondero issues (.2).	0.20	1145.00	\$229.00
12/23/2020	JNP	AA	Conference with DSI and PSZJ regarding transition issues.	0.20	1075.00	\$215.00
12/23/2020	JNP	AA	Conference with DSI, PSZJ and J. Seery regarding transition issues.	1.00	1075.00	\$1,075.00
12/23/2020	JNP	AA	Review proposed letter to Multi Strat investors and provide comments; Conference with Ira D. Kharasch regarding same.	0.40	1075.00	\$430.00
12/23/2020	MFC	AA	Emails regarding SEI contract and motion to approve same.	0.10	995.00	\$99.50
12/23/2020	MFC	AA	Drafting SEI motion.	0.60	995.00	\$597.00
12/23/2020	MFC	AA	Review SEI contract.	0.40	995.00	\$398.00
12/23/2020	GVD	AA	Conference with PSZJ and WilmerHale re fiduciary obligations	0.60	825.00	\$495.00
12/23/2020	GVD	AA	Attend internal call re transition issues	1.10	825.00	\$907.50
12/23/2020	GVD	AA	Conference with J. Romey re open transition issues and next steps	0.90	825.00	\$742.50
12/24/2020	IDK	AA	E-mail to DSI re Siepe contract re transition (.1).	0.10	1145.00	\$114.50
12/24/2020	GVD	AA	Multiple conference with counsel to Eagle Equity re potential deal points	0.50	825.00	\$412.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/28/2020	IDK	AA	E-mails with DSI, M. Calloway re markup of SEI proposed contract.	0.20	1145.00	\$229.00
12/28/2020	JNP	AA	Review email regarding assumption of CLO contracts.	0.10	1075.00	\$107.50
12/28/2020	MFC	AA	Mark up SEI agreement.	1.20	995.00	\$1,194.00
12/28/2020	MFC	AA	Revising motion to approve SEI agreement.	0.40	995.00	\$398.00
12/28/2020	GVD	AA	Conference with J. Seery re administrative authority issues	0.40	825.00	\$330.00
12/28/2020	GVD	AA	Conference with F. Caruso re transition issues	0.40	825.00	\$330.00
12/28/2020	GVD	AA	Conference with insurance broker and follow up re same	0.40	825.00	\$330.00
12/29/2020	GVD	AA	Conference with J. Donohue re demand amounts	0.20	825.00	\$165.00
12/29/2020	GVD	AA	Conference with F. Caruso re insurance issues	0.20	825.00	\$165.00
12/29/2020	GVD	AA	Review transition issues term sheet	0.20	825.00	\$165.00
12/30/2020	JNP	AA	Review asset listing Committee wants to share with D. Parker.	0.10	1075.00	\$107.50
12/30/2020	GVD	AA	Attend to issues re conversion of promissory note	0.80	825.00	\$660.00
12/30/2020	GVD	AA	Review order re deposit of funds into court registry	0.20	825.00	\$165.00
12/30/2020	GVD	AA	Conference with F. Caruso re transition items	0.40	825.00	\$330.00
12/30/2020	GVD	AA	Conference with I. Kharasch re transition issues	0.20	825.00	\$165.00
12/30/2020	GVD	AA	Draft letter to M. Lynn re transition issues	0.60	825.00	\$495.00
12/31/2020	GVD	AA	Conference with J. Romey and Governance Re	0.50	825.00	\$412.50
12/31/2020	GVD	AA	Conference with T. Surgent re directorships	0.20	825.00	\$165.00
				79.00		\$75,881.00

Asset Disposition [B130]

12/03/2020	JNP	AD	Conference with R. Nelms regarding calls with M. Lynne regarding asset sales.	0.20	1075.00	\$215.00
12/16/2020	IDK	AD	E-mails with attorneys re Dondero counsel markup of order continuing Dondero 363 motion, including review of same.	0.20	1145.00	\$229.00
				0.40		\$444.00

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Appeals [B430]						
10/07/2020	JAM	AP	E-mails with Z. Annable re: filing of counter-designations for Dondero appeal of Acis Rule 9019 order (0.2); review/revise counter-designations for Dondero appeal of Acis Rule 9019 order (0.2); communications with A. Chiarello, R. Patel, G. Demo re: counter-designations for Dondero appeal of Acis Rule 9019 order (0.1);	0.50	1075.00	\$537.50
11/30/2020	LSC	AP	Review designations of appeal filed by UBS and Dondero and prepare counter-designations of appeal for J., Morris.	1.90	425.00	\$807.50
12/04/2020	JAM	AP	E-mails with Z. Annable re: appellate designations for UBS appeal of Redeemer Rule 9019 order (0.2); e-mail to S. Tomkowiak, A. Clubok, G. Demo re: sealing issues relating to appeal (0.2); e-mails with A. Chiarello, G. Demo re: appellate designations for Dondero appeal of Acis Rule 9019 order (0.2); draft Disclosure of Interested Parties for UBS appeal of Redeemer Rule 9019 motion (1.4);	2.00	1075.00	\$2,150.00
12/06/2020	JAM	AP	Review entries on Dondero's designations in connection with appeal of Acis Rule 9019 order (1.1); review of the docket concerning the Debtor's exhibits admitted in connection with the Acis Rule 9019 motion (0.6); preparation of counter-designations for Dondero appeal of Acis Rule 9019 order (0.4); e-mails with Z. Annable, G. Demo re: counter-designations for Dondero appeal of Acis Rule 9019 order (0.1);	2.20	1075.00	\$2,365.00
12/08/2020	JNP	AP	Review and respond to email regarding Redeemer intervention on UBS appeal.	0.10	1075.00	\$107.50
12/08/2020	JAM	AP	E-mails with M. Hankin, J. Pomerantz, J. Seery (others) re: Redeemer Committee intervention in UBS appeal of Redeemer Rule 9019 Order (0.1)	0.10	1075.00	\$107.50
12/11/2020	JNP	AP	Conference with Jenner, Latham and John A. Morris regarding meet and confer regarding Motion to Intervene.	0.20	1075.00	\$215.00
12/18/2020	HRW	AP	Draft proposed Notice of Appeal for Dondero motion (0.8);	0.80	625.00	\$500.00
12/19/2020	JAM	AP	Draft Certificate of Interested Parties for Dondero appeal of Acis Rule motion (0.4); e-mail to Z. Annable, J. Pomerantz, G. Demo re: Certificate of	0.50	1075.00	\$537.50

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			Interested Parties for Dondero appeal of Acis Rule motion (0.1);			
12/21/2020	EAW	AP	Research re: appellate issues (UBS).	3.20	825.00	\$2,640.00
12/22/2020	JNP	AP	Emails to and from Latham regarding Notice of Appeal.	0.10	1075.00	\$107.50
12/22/2020	JNP	AP	Review email from T. Mascherin regarding UBS appeal.	0.10	1075.00	\$107.50
12/22/2020	EAW	AP	Review emails to/from J. Pomerantz, T. Mascherin and A. Clubok re: appellate issues.	0.10	825.00	\$82.50
				11.80		\$10,265.00

Bankruptcy Litigation [L430]

11/03/2020	LSC	BL	Retrieve appendices regarding Daugherty motion and prepare file for attorney review.	0.40	425.00	\$170.00
11/06/2020	RMP	BL	Conference with I. Kharasch re UBS.	0.20	1445.00	\$289.00
11/07/2020	LSC	BL	Retrieve exhibits in connection with Daugherty 3018 motion and opposition to summary judgment for E. Wagner (.5).	0.50	425.00	\$212.50
11/09/2020	LSC	BL	Retrieve exhibits for H. Winograd in connection with 3018 pleadings.	0.30	425.00	\$127.50
11/18/2020	RMP	BL	Conferences with I. Kharasch re plan and litigation issues.	0.40	1445.00	\$578.00
11/20/2020	RMP	BL	Conferences with J. Pomerantz and I. Kharasch re UBS and other claim issues.	0.40	1445.00	\$578.00
12/01/2020	JAM	BL	Review e-mails re: document production (0.3); telephone conference with J. Romey, T. Jeremiassen re: document production (financial documents) (0.4); telephone conference with T. Jeremiassen, J. Romey, P. Montgomery, C. Rognes, FTI re: document production (financial documents) (0.6); e-mail to J. Seery re: Daugherty's Delaware II case (0.1); e-mails with J. Kane, I. Leventon, S. Vitiello, DSI re: Grant Scott e-mails (0.2); communications with J. Seery, Z. Annable, J. Pomerantz, I. Kharasch, G. Demo re: Daugherty motion to lift the automatic stay (0.2); review Daugherty motion to lift the automatic stay (0.4); review/revise letter to K&L Gates re: Dondero (0.4).	2.60	1075.00	\$2,795.00
12/01/2020	GVD	BL	Multiple conferences with J. Morris and J. Romey re discovery issues (0.5); correspondence with J. Seery	1.80	825.00	\$1,485.00

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			re potential structured products issues (0.6); review correspondence re CLO issuers and next steps (0.2); review cease and desist letters (0.5)			
12/02/2020	KKY	BL	Draft 3rd removal extension motion	0.60	425.00	\$255.00
12/02/2020	JAM	BL	Review/revise cease and desist letter to KL &Gates re: CLO investment decisions (0.2); e-mails with J. Seery, G. Demo re: revised letter to K&L Gates (0.1); e-mails with M. Hankin, G. Demo, E. Wagner re: appellate record for UBS appeal of Redeemer 9019 order (0.1); telephone conference with J. Pomerantz, I. Kharasch, G. Demo re: demands for payment on Promissory Notes and related matters (0.8).	1.20	1075.00	\$1,290.00
12/02/2020	LSC	BL	Prepare and transmit document production to Committee.	0.50	425.00	\$212.50
12/02/2020	GVD	BL	Review revisions to cease and desist letter	0.30	825.00	\$247.50
12/03/2020	IDK	BL	Review of numerous correspondence with J Morris, I Leventon, CEO on issues of production of certain docs to UCC and related Dugaboy issues (.2); Review of related correspondence with J Morris, Klos, re UCC discovery and next steps, as well as further production issues (.1).	0.30	1145.00	\$343.50
12/03/2020	IDK	BL	E-mails to J Morris, J. Pomerantz re cease and desist letter to NextPoint (.1); E-mails to G Demo re CLO issuers and Dondero communication to same (.1).	0.20	1145.00	\$229.00
12/03/2020	IDK	BL	E-mails to G Demo re revised draft cease and desist letter to Dondero, including review of same, and J Morris markup (.2); E-mails to J Morris re his markup of same and my feedback, and next steps (.2).	0.40	1145.00	\$458.00
12/03/2020	JNP	BL	Conference with J. Dubel regarding Dondero actions, response thereto and other issues.	0.50	1075.00	\$537.50
12/03/2020	JNP	BL	Review email regarding Committee request for discovery.	0.10	1075.00	\$107.50
12/03/2020	JNP	BL	Conference with Gregory V. Demo, John A. Morris and Ira D. Kharasch regarding Dondero conduct and next steps.	0.50	1075.00	\$537.50
12/03/2020	JNP	BL	Conference with John A. Morris regarding Dondero conduct and letter.	0.10	1075.00	\$107.50
12/03/2020	JNP	BL	Conference with Gregory V. Demo (2x) regarding letter to Dondero.	0.30	1075.00	\$322.50

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12/03/2020	JNP	BL	Review letter to Dondero regarding interference.	0.10	1075.00	\$107.50
12/03/2020	JNP	BL	Conference with J. Seery regarding Dondero conduct and call with M. Lynne (2x).	0.30	1075.00	\$322.50
12/03/2020	JNP	BL	Emails with M. Lynne regarding call.	0.10	1075.00	\$107.50
12/03/2020	JNP	BL	Conference with Ira D. Kharasch and M. Lynne regarding call to discuss concerns with Dondero conduct.	0.30	1075.00	\$322.50
12/03/2020	RMP	BL	Conference with I. Kharasch and review agreements.	0.60	1445.00	\$867.00
12/03/2020	JAM	BL	Telephone conference with T. Jeremiassen, J. Romey re: status of document production (0.2); e-mails with I. Leventon, S. Vitiello, T. Jeremiassen, J. Romey re: Dugaboy documents (0.2); e-mails with J. Seery, J. Pomerantz, I. Kharasch, G. Demo re: document production issues (0.2); e-mail to I. Leventon, S. Vitiello, T. Jeremiassen, J. Romey re: text messages/cell phones (0.1); review of record for UBS appeal for Redeemer Rule 9019 motion (2.4); e-mails w/ Z. Annable re: counter-designations for UBS appeal of Redeemer Rule 9019 order (0.1); telephone conference with M. Hankin re: potential counter-designations for UBS appeal of Redeemer Rule 9019 order (0.2); telephone conference with J. Pomerantz, I. Kharasch, G. Demo (partial) re: Dondero threats and related conduct (0.4); revise letter to M. Lynn re: Dondero threats and related conduct (0.2).	4.00	1075.00	\$4,300.00
12/03/2020	LSC	BL	Prepare and transmit document production to Committee.	0.50	425.00	\$212.50
12/03/2020	GVD	BL	Revise and send cease and desist letter to K&L Gates (0.6); conference with J. Morris re litigation strategy (0.3); multiple correspondence with B. Assink re Dondero claims (0.5); conference with H. O'Neill re Foley proof of claim (0.1); conference re potential CLO issues (0.8); conference with J. Pomerantz re cease & desist letters (0.2); revise additional cease & desist letter re comments from J. Pomerantz (0.5); conference with K&L Gates re cease and desist letter (0.5); conference with J. Pomerantz, I. Kharasch, and J. Morris re potential litigation issues (partial attendance) (0.3); conference with J. Romey re discovery issues (0.2)	4.00	825.00	\$3,300.00
12/04/2020	IDK	BL	E-mails with attorneys re my recommendations on steps re injunction action vs Dondero (.2); E-mails to	0.60	1145.00	\$687.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			attorneys re draft of cease and desist letter vs Dondero, including feedback from Board, others re same, and re timing and status on same (.3); Review of revised and then finalized letter re same (.1).			
12/04/2020	IDK	BL	Consider Stern issues re actions vs Dondero on notes (.2); E-mails to J. Pomerantz re anticipated collection action vs Dondero and Stern issues (.1); Numerous E-mails with G Glazer re same, jurisdictional concerns, initial feedback on turnover of assets as core proceeding, and need for memo for Board (.4).	0.70	1145.00	\$801.50
12/04/2020	IDK	BL	Review of various E-mails with CEO, J Morris on update on discovery issues with UCC and next steps.	0.10	1145.00	\$114.50
12/04/2020	JNP	BL	Conference with Latham, Elissa A. Wagner and Robert J. Feinstein regarding UBS summary judgment order.	0.60	1075.00	\$645.00
12/04/2020	JNP	BL	Conference with J. Dubel regarding Dondero litigation.	0.20	1075.00	\$215.00
12/04/2020	JAM	BL	Revise letter to M. Lynn re: Dondero business interference (0.1); draft letter to M. Lynn re: Dondero threats to J. Seery (0.5); e-mails with Board, J. Pomerantz, I. Kharasch, G. Demo re: letter to M. Lynn concerning Dondero threats to J. Seery (0.2); e-mails with I. Leventon re: production of valuation report (0.1); revise letter to M. Lynn concerning Dondero threats to J. Seery (0.1); e-mail to J. Pomerantz, I. Kharasch, G. Demo re: Disclosure of Interested Parties for UBS appeal of Redeemer Rule 9019 motion (0.1); telephone conference with R. Patel re: indemnification claim relating to Acis and NWCC (0.2); telephone conference with G. Demo re: litigation matters (0.2); telephone conference with J. Seery re: discovery issues (0.4); telephone conference with J. Romey re: document production issues (0.2); e-mails to J. Seery, J. Pomerantz, I. Kharasch, G. Demo re: discovery issues (0.3); e-mail to UCC counsel re: document production (0.1).	2.50	1075.00	\$2,687.50
12/04/2020	GIG	BL	Multiple emails with Ira D. Kharasch re jurisdiction issue	0.30	895.00	\$268.50
12/04/2020	GIG	BL	Research re bankruptcy court jurisdiction over note claims	3.60	895.00	\$3,222.00
12/04/2020	GVD	BL	Correspondence with Board re cease & desist letters (0.1); attend to matters re service of cease and desist	1.60	825.00	\$1,320.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			letters (1.2); conference with J. Morris re litigation strategy (0.3)			
12/05/2020	IDK	BL	Telephone conferences with J Morris re logistics of preparing injunction papers vs Dondero, issues on potential other defendants, this weekend to file Sunday night (.2); E-mails to J. Pomerantz re same and consider (.2); E-mails to J Morris, others re his draft order re same and list of tasks for motion, TRO re same, further issues (.3).	0.70	1145.00	\$801.50
12/05/2020	JEO	BL	Initial drafting of complaint for injunctive relief against James Dondero	3.00	925.00	\$2,775.00
12/05/2020	JAM	BL	Work on Seery affidavit in support of TRO against Dondero (3.7); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd, J. O'Neill re: complaint and TRO against Dondero (0.3); telephone conference I. Kharasch re: complaint and TRO against Dondero (0.1); telephone conference with G. Demo re: complaint and TRO against Dondero (0.1); telephone conference J. O'Neill re: complaint and TRO against Dondero (0.1).	4.30	1075.00	\$4,622.50
12/05/2020	GIG	BL	Research re bankruptcy court jurisdiction over note claims	2.20	895.00	\$1,969.00
12/05/2020	GVD	BL	Conference with J. Morris re litigation strategy (0.2); draft insert to J. Seery declaration (1.4); conference with J. Seery re litigation issues and next steps (0.5)	2.10	825.00	\$1,732.50
12/06/2020	IDK	BL	E-mails to attorneys re draft of CEO declaration in support of TRO vs Dondero, including brief review of same, and feedback on same from CEO (.2); Review of revised motion papers and declaration (.2); E-mail and telephone conference with J. Pomerantz re same and re other related motions vs Dondero and CLO noteholders issues (.3).	0.70	1145.00	\$801.50
12/06/2020	JNP	BL	Conference with Board, John A. Morris, H. Winograd and Gregory V. Demo regarding Dondero litigation.	1.00	1075.00	\$1,075.00
12/06/2020	JNP	BL	Review J. Seery Declaration regarding Dondero litigation.	0.20	1075.00	\$215.00
12/06/2020	JEO	BL	Drafting ancillary documents for complaint for injunctive relief against James Dondero	2.50	925.00	\$2,312.50
12/06/2020	JAM	BL	Complete/review/revise J. Seery declaration in support of TRO (2.9): e-mails to J. Pomerantz, I. Kharasch, G. Demo, J. O'Neill, H. Winograd re:	6.90	1075.00	\$7,417.50

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			revised versions of the Seery declaration (0.3); e-mails to G. Demo, H. Winograd, L. Canty re: exhibits to J. Seery declaration (0.5); further revisions to J. Seery declaration in support of TRO (1.3); e-mails to Board, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: J. Seery declaration, proposed order on TRO, and revisions thereto (0.2); e-mail to Z. Annable re: potential counter-designations concerning Dondero's appeal of Acis Rule 9019 order (0.2); further revisions to Seery declaration in light of comments received from J. Seery and J. Dubel (0.2); e-mail to Board, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: revised Seery declaration (0.1); e-mails with J. O'Neill, H. Winograd re: status of Complaint against Dondero and related matters (0.1); e-mail to J. O'Neill, H. Winograd, L. Canty re: status, filings (0.1) ; telephone conference with J. Seery, J. Dubel, R. Nelms, J. Pomerantz, G. Demo, H. Winograd (partial participation) re: Dondero filings, Daugherty settlement, and related matters (1.0).			
12/06/2020	GVD	BL	Review Seery declaration (0.7); conference with Board re potential litigation issues (1.0)	1.70	825.00	\$1,402.50
12/06/2020	HRW	BL	Draft MOL and Complaint in support of application for TRO (10.0); Call with J. Morris, J. Pomerantz, G. Demo, and client re: Dondero issues and TRO (0.5).	10.50	625.00	\$6,562.50
12/07/2020	IDK	BL	E-mails with Board, J Morris re draft complaint vs Dondero, including brief review of same, and feedback from CEO (.3); E-mails with attorneys re need to contact UCC re upcoming complaint vs Dondero, and feedback from CEO re same (.1); E-mails with Board, attorneys re draft of motion in support of TRO vs Dondero, and need for substantial revisions, including review of same, and further changes to complaint, as well as motion for expedited hearing (.4); Review briefly correspondence with local counsel on filing such documents and questions on verified complaint (.1).	0.90	1145.00	\$1,030.50
12/07/2020	IDK	BL	E-mails with attorneys re filing of complaint/TRO vs Dondero and next steps, including communications with Lynn.	0.20	1145.00	\$229.00
12/07/2020	IDK	BL	Telephone conference with J. Pomerantz re his call with Lynn on Dondero (.1); Attend conference call with Board on complaint vs Dondero and communications with Dondero counsel re same (.5); Telephone conference with J. Pomerantz re his next	0.70	1145.00	\$801.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			call with Lynn re same (.1).			
12/07/2020	IDK	BL	E-mails with G Glazer on status of Stern issues re demand note litigation vs Dondero related entities.	0.10	1145.00	\$114.50
12/07/2020	JNP	BL	Review complaint and TRO against Dondero.	0.20	1075.00	\$215.00
12/07/2020	JNP	BL	Conference with John A. Morris regarding complaint and TRO against Dondero.	0.10	1075.00	\$107.50
12/07/2020	JNP	BL	Conference with M. Clemente regarding complaint and TRO against Dondero.	0.20	1075.00	\$215.00
12/07/2020	JNP	BL	Conference with J. Dubel regarding complaint against Dondero.	0.10	1075.00	\$107.50
12/07/2020	JNP	BL	Email to M. Lynn regarding Complaint and TRO.	0.10	1075.00	\$107.50
12/07/2020	JNP	BL	Conference with John A. Morris regarding Dondero Complaint and TRO (multiple).	0.30	1075.00	\$322.50
12/07/2020	JNP	BL	Conference with John A. Morris in preparation for call with M. Lynn regarding Dondero complaint.	0.10	1075.00	\$107.50
12/07/2020	JNP	BL	Conference with John A. Morris and M. Lynn regarding Dondero complaint and TRO (2x).	0.60	1075.00	\$645.00
12/07/2020	JNP	BL	Email to Board regarding call to discuss call with M. Lynn regarding Dondero complaint.	0.10	1075.00	\$107.50
12/07/2020	JNP	BL	Conference with Board and PSZJ regarding debrief of call with M. Lynn regarding Dondero complaint.	0.50	1075.00	\$537.50
12/07/2020	JNP	BL	Email to John A. Morris regarding proposed email to local counsel regarding TRO.	0.10	1075.00	\$107.50
12/07/2020	JNP	BL	Conference with Ira D. Kharasch regarding call with M.Lynn.	0.10	1075.00	\$107.50
12/07/2020	JNP	BL	Review email regarding CLOs; Conference with Gregory V. Demo and Ira D. Kharasch regarding same.	0.30	1075.00	\$322.50
12/07/2020	JNP	BL	Conference with J. Dubel regarding UBS (2x).	0.50	1075.00	\$537.50
12/07/2020	JNP	BL	Conference with Robert J. Feinstein regarding UBS.	0.10	1075.00	\$107.50
12/07/2020	RMP	BL	Conference with I. Kharasch re claims status.	0.30	1445.00	\$433.50
12/07/2020	JEO	BL	Emails with PSZJ team re new adv proceeding against James Dondero	0.40	925.00	\$370.00
12/07/2020	JMF	BL	Review complaint re Dondero and prohibited actions.	0.40	925.00	\$370.00

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12/07/2020	JAM	BL	Review/revise Complaint, Memorandum of Law, Seery Declaration, proposed Order, Emergency Motion and Motion for TRO in connection action against James Dondero (7.9); review/revise Motion for Expedited Hearing (0.2); communications with Z. Annable re: Motion for Expedited Hearing (0.1); telephone conference with J. Pomerantz, M. Lynn re: "meet and confer" on injunction papers (0.3); telephone conference with Board, J. Pomerantz, G. Demo, H. Winograd re: action against James Dondero (0.4); communications with H. Winograd, Z. Annable, M. Heyward re: preparation of papers to be filed against James Dondero (0.6); communications with J. Pomerantz re: papers to be filed against James Dondero (0.4); communications with G. Demo re: papers to be filed against James Dondero (0.3); telephone conference with J. Pomerantz, M. Lynn re: "meet and confer" on injunction papers (0.2); telephone conference with J. Kathman re: Daugherty litigation and settlement matters (0.4); telephone conference with G. Demo re: litigation matters (0.1); telephone conference with J. Pomerantz re: litigation matters (0.2); review Adversary Cover Sheet and communications with Z. Annable, J. Pomerantz re: same (0.1); e-mail to J. Pomerantz re: Dondero compliance with January 9, 2020, Order (0.3).	11.50	1075.00	\$12,362.50
12/07/2020	GIG	BL	Research re bankruptcy court jurisdiction over note claims	5.50	895.00	\$4,922.50
12/07/2020	GIG	BL	Research re bankruptcy court jurisdiction over note claims	4.30	895.00	\$3,848.50
12/07/2020	GVD	BL	Attend to issues re Dondero TRO (2.2); conference with J. Seery re Dondero TRO (0.3); attend Board call re Dondero issues (0.4); conference with J. Morris re litigation strategy (0.1)	3.00	825.00	\$2,475.00
12/07/2020	HRW	BL	Edit and review Complaint, Memorandum of Law, Seery Declaration, proposed Order, Emergency Motion and Motion for TRO in connection action against James Dondero (8.5); Call with Board, J. Pomerantz, G. Demo J. Morris re: action against James Dondero (0.4); Communications with J. Morris, Z. Annable, M. Heyward re: preparation of papers to be filed against James Dondero (0.6).	9.50	625.00	\$5,937.50
12/08/2020	IDK	BL	Attend conference call on TRO papers (.4); E-mails with J Morris re court's setting of hearing on same (.1).	0.50	1145.00	\$572.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/08/2020	IDK	BL	E-mail to Board, J. Pomerantz re Dondero counsel's comments to proposed TRO, including review of same, as well as separate communication from Dondero personally re his text/threat (.2); E-mails with Board, J Morris, others re proposed markup to TRO in light of Lynn's feedback re same, including review of same, and comments/feedback re same (.3); Review of correspondence with Lynn re our demand for permanent injunction, and Lynn response (.1).	0.60	1145.00	\$687.00
12/08/2020	IDK	BL	E-mails with J Fried re his comments to draft of removal motion, and my feedback re same, including review of same and draft motion.	0.30	1145.00	\$343.50
12/08/2020	JNP	BL	Email to and from M. Hankin regarding TRO hearing on Dondero matter.	0.10	1075.00	\$107.50
12/08/2020	JNP	BL	Review email from B. Assink and email to Board regarding proposed modifications to TRO.	0.10	1075.00	\$107.50
12/08/2020	JNP	BL	Conference with Gregory V. Demo, John A. Morris and Ira D. Kharasch regarding Dondero TRO changes requested.	0.40	1075.00	\$430.00
12/08/2020	JNP	BL	Conference with J. Dubel regarding TRO against Dondero.	0.10	1075.00	\$107.50
12/08/2020	JNP	BL	Review revised Injunction Order.	0.10	1075.00	\$107.50
12/08/2020	JNP	BL	Emails to and from M. Lynne regarding TRO.	0.20	1075.00	\$215.00
12/08/2020	JNP	BL	Review Motion for Temporary Restraining Order by CLOs regarding sales and emails regarding same.	0.20	1075.00	\$215.00
12/08/2020	RMP	BL	Conference with J. Pomerantz and I. Kharasch re Dondero issues and review e-mails re same.	0.60	1445.00	\$867.00
12/08/2020	JMF	BL	Review and comment re removal extension motion.	0.80	925.00	\$740.00
12/08/2020	JAM	BL	Telephone conference with J. Seery re: Dondero motion and related matters (0.2); telephone conference with J. Seery, G. Demo, Kasowitz attorney re: potential litigation (0.5); telephone conference with T. Jeremiassen, J. Romey re: document production (0.1); e-mails w/ P. Montgomery, C. Rognes re: document production (0.1); telephone conference with P. Montgomery, C. Rognes re: document production (0.3); telephone conference with G. Demo re: CLO/Dondero litigation matters (0.3); e-mails with J. Kathman re: Daugherty litigation and related matters (0.3); e-mail	4.50	1075.00	\$4,837.50

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			to L. Drawhorn, G. Demo re: SE Multifamily scheduling order (0.1); e-mail to S. Tomkowiak, J. Pomerantz, A. Clubok re: UBS record on appeal (0.1); e-mail to Board, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: "as filed" papers concerning Dondero (0.1); review amended Memorandum of Law on Dondero TRO motion (0.2); e-mails with H. Winograd re: amended Memorandum of Law on Dondero TRO motion (0.2); e-mail to M. Katz, C. Woods re: Daugherty litigation issues (0.2); e-mail to K. Lee, J. O'Neill, J. Fried re: litigation scheduling matters (0.1); e-mail to Z. Annable re: amended Memorandum of Law on Dondero TRO motion (0.1); telephone conference with J. Pomerantz, I. Kharasch, G. Demo re: M. Lynn's comments to proposed Order resolving Dondero TRO (0.4); review/revise proposed Order resolving Dondero litigation (0.5); e-mails re: J. Pomerantz re: revisions to proposed Order resolving Dondero litigation (0.1); further revisions to proposed Order resolving Dondero litigation (0.2); e-mail to Board, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: revised proposed Order resolving Dondero litigation (0.2); review draft notice re: hearing on TRO motion (0.1); communications with Z. Annable re: draft notice for TRO motion (0.1);			
12/08/2020	GIG	BL	Research re bankruptcy court jurisdiction over note claims	1.20	895.00	\$1,074.00
12/08/2020	GIG	BL	Prepare memo re jurisdiction issue	6.90	895.00	\$6,175.50
12/08/2020	GIG	BL	Emails Ira D. Kharasch re jurisdiction memo	0.10	895.00	\$89.50
12/08/2020	GVD	BL	Review discovery related to UBS litigation	1.10	825.00	\$907.50
12/08/2020	GVD	BL	Review Dondero motion re 363 and respond to same	2.00	825.00	\$1,650.00
12/08/2020	GVD	BL	Conference with PSZJ team re Dondero TRO	0.40	825.00	\$330.00
12/08/2020	GVD	BL	Conference with J. Morris re bankruptcy strategy	0.40	825.00	\$330.00
12/08/2020	HRW	BL	Edit and review Memorandum of Law in Support of TRO against Dondero (2.0).	2.00	625.00	\$1,250.00
12/09/2020	IDK	BL	Review of new motion by NPA re motion to stop CLOs from selling assets, and consider response (.3); Numerous E-mails with attorneys re basis of same and next steps to respond, as well as need for call on Dondero motion (.2); Attend conference call with J. Pomerantz, others, on new litigation from CLO, demand note upcoming litigation, Debtors'	1.30	1145.00	\$1,488.50

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			TRO litigation vs Dondero, others, Daugherty, Hunter Mountain, and other (.8).			
12/09/2020	IDK	BL	E-mails with CEO and attorneys re CLO litigation and retention of Kasowitz, and correspondence with Wilmer Hale re same, as well as correspondence with CLO issuers on supporting our position vs NPA, and our position on expedited hearing (.3); Review of correspondence with local counsel re our position to chambers re not consenting to NPA motion for expedited hearing, and feedback from chambers (.2).	0.50	1145.00	\$572.50
12/09/2020	IDK	BL	Various E-mails with attorneys re communications with Lynn re issues on form of TRO and need for permanent injunction language and their disagreement, as well as need for indemnity for damages if sales not occurring (.2); Numerous E-mails with CEO and attorneys re further markup of draft order re Dondero TRO and timing for Board (.2).	0.40	1145.00	\$458.00
12/09/2020	IDK	BL	E-mails with G Demo re his correspondence with NPA re their motion to compel (.1); Numerous E-mails with CEO and attorneys re NPA's counter to resolution of timing of expedited hearing re sale limitations in interim, and how to respond on limitations on trade issues, and my feedback on same (.3).	0.40	1145.00	\$458.00
12/09/2020	JNP	BL	Email to and from team regarding status of TRO Order.	0.10	1075.00	\$107.50
12/09/2020	JNP	BL	Email to M. Lynn enclosing Order on TR.	0.10	1075.00	\$107.50
12/09/2020	JNP	BL	Conference with PSZJ team regarding CLO litigation and other pending litigation.	0.80	1075.00	\$860.00
12/09/2020	JNP	BL	Conference with Gregory V. Demo, John A. Morris and KL Gates regarding scheduling hearing on NPA motion.	0.20	1075.00	\$215.00
12/09/2020	JNP	BL	Conference with John A. Morris after call with KL Gates.	0.10	1075.00	\$107.50
12/09/2020	JNP	BL	Conference with M. Clemente regarding Dondero TRO hearing.	0.20	1075.00	\$215.00
12/09/2020	JNP	BL	Review and respond to emails regarding hearing date for CLO litigation.	0.10	1075.00	\$107.50
12/09/2020	JNP	BL	Conference with John A. Morris regarding Dondero TRO hearing.	0.30	1075.00	\$322.50

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12/09/2020	JNP	BL	Begin to review draft opposition to Dondero sale motion.	0.10	1075.00	\$107.50
12/09/2020	JNP	BL	Email to Board regarding Dondero response to injunction.	0.10	1075.00	\$107.50
12/09/2020	RMP	BL	Conference with I. Kharasch re pending litigation issues.	0.30	1445.00	\$433.50
12/09/2020	JEO	BL	Review issues and scheduling re TRO for Dondero	0.40	925.00	\$370.00
12/09/2020	JMF	BL	Review motion for TRO.	0.40	925.00	\$370.00
12/09/2020	JMF	BL	Review HCMFA motion to restrict sales.	0.50	925.00	\$462.50
12/09/2020	JAM	BL	Review/analyze motion for TRO filed by NexPoint (0.6); e-mail to J. Pomerantz, I. Kharasch, G. Demo re: motion for TRO filed by NexPoint (0.1); review draft Notice of Adjournment for HarbourVest Rule 3018 hearing (0.1); communications with Z. Annable, E. Weinberger, D. Stroik re: Notice of Adjournment for HarbourVest Rule 3018 hearing (0.1); telephone conference with J. Seery, G. Demo, Quinn Emanuel re: potential engagement for CLO litigation (0.6); revise draft Order resolving Dondero injunction proceedings (0.1); telephone conference with J. Pomerantz, I. Kharasch, G. Demo re: TRO litigation matters (0.8); e-mails with Board, J. Pomerantz, I. Kharasch, G. Demo re: revised draft Order resolving Dondero injunction proceedings (0.1); e-mails with I. Leventon, S. Vitiello, T. Jeremiassen, J. Romey re: document production (0.1); telephone conference with I. Leventon re: document production, Daugherty litigation (0.3); draft Stipulation resolving Daugherty (second) Adversary Proceeding concerning stay extension (0.8); e-mail to J. Pomerantz, I. Kharasch, G. Demo re: revised draft Order resolving Dondero injunction proceedings (0.1); prepare for TRO hearing (2.3); e-mail to J. Seery, J. Pomerantz, I. Kharasch, G. Demo, B. Sharp, T. Jeremiassen, J. Romey re: document production issues (0.3); e-mail to J. Kathman re: draft Stipulation resolving Daugherty (second) Adversary Proceeding concerning stay extension (0.1); review draft stipulation extending UCC deadline to commence an action against CLO HoldCo (0.1); e-mails with C. Rognes, P. Montgomery re: draft stipulation extending UCC deadline to commence an action against CLO HoldCo (0.1); e-mails with C. Rognes, P. Montgomery re: document production (0.1);	7.60	1075.00	\$8,170.00

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			telephone conference with J. Seery re: preparation for TRO hearing (0.5); telephone conference with J. Pomerantz re: preparation for TRO hearing (0.3).			
12/09/2020	GVD	BL	Draft response to Dondero 363 motion	3.40	825.00	\$2,805.00
12/09/2020	GVD	BL	Revise and circulate response to Dondero 363 re additional research	2.40	825.00	\$1,980.00
12/09/2020	GVD	BL	Conference with PSZJ litigation team re open litigation items	0.80	825.00	\$660.00
12/09/2020	GVD	BL	Conference with U. Itkin re CLO litigation issues	0.60	825.00	\$495.00
12/09/2020	GVD	BL	Conference with counsel to CLO issuers counsel re CLO litigation	0.40	825.00	\$330.00
12/09/2020	GVD	BL	Compile documents re CLO litigation issues	0.20	825.00	\$165.00
12/09/2020	GVD	BL	Conference with J. Seery re CLO litigation	0.10	825.00	\$82.50
12/09/2020	GVD	BL	Conference with counsel to CLO issuers re expedited hearing	0.30	825.00	\$247.50
12/09/2020	GVD	BL	Multiple conferences with J. Elkin re research issues	0.60	825.00	\$495.00
12/09/2020	JE	BL	Telephone conference with Mr. Demo regarding research issues in response to Dondero motion (.3); review Dondero motion; draft response and operations protocol (1.2); research issues relating to same as to property of estate, operations in the ordinary course of business and standing (4.8); review revised response (.5).	6.80	1100.00	\$7,480.00
12/09/2020	HRW	BL	PSZJ call re: litigation update (0.8).	0.80	625.00	\$500.00
12/10/2020	IDK	BL	Review and consider revised opposition to Dondero 363 motion (.2); E-mails with G Demo re my extensive comments for changes to same, as well as feedback of others (.4); Further correspondence with attorneys on other issues to address in opposition to Dondero motion, including competitive bidding issues, Multi Strat sales re comp bidding and other examples (.3).	0.90	1145.00	\$1,030.50
12/10/2020	IDK	BL	Review of various revised oppositions to Dondero 363 motion, including J. Pomerantz revision to intro and my feedback re same (.3); E-mails with attorneys re Lynn proposal on resolving 363 motion by agreement on no sales, and how to respond (.2); E-mails with J. Pomerantz re his draft response to Lynn re counter proposal, and feedback/changes of G Demo to same (.2); Review of correspondence	1.00	1145.00	\$1,145.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			with Lynn re same and Lynn further counter-proposal re notice of sales, and intention to depose all 3 directors (.1); E-mails with Board and attorneys re same and how to respond, including CEO feedback on asset sale issues/procedure (.2).			
12/10/2020	IDK	BL	E-mails with J Morris re his draft notes on opening and other remarks for today's upcoming hearing, including feedback of others (.3); Attend most of court hearing on motion for injunction against Dondero conduct (2.0); Office conference from J. Pomerantz re result of same and next steps for Dondero motion next week, and need for call re same (.2); Attend conference call with attorneys re same (.3).	2.80	1145.00	\$3,206.00
12/10/2020	IDK	BL	E-mails with DSI re NPA and DLA, and potential conflict issues given NPA motion (.1); Attend conference call with attorneys re K&L Gates motion for Nextpoint re CLOs (.4); Telephone conference with J. Pomerantz and RMP re Dondero hearing on TRO (.2); Telephone conference with J. Pomerantz re opposition to 363 motion (.1).	0.80	1145.00	\$916.00
12/10/2020	IDK	BL	Review of correspondence to Board, others re current issues on discovery with UCC.	0.10	1145.00	\$114.50
12/10/2020	IDK	BL	Review of correspondence with NPA counsel on their motion re CLO sales and discovery issues, as well as with Hayley re same (.2); Review of Kasowitz outline of arguments vs NPA on its motion re CLO contracts/manager obligations, and consider (.2); Review briefly G Demo's initial outline of argument for opposition to NPA motion (.1); E-mail to G Demo re his communication with CLO issuers re NPA motion and its role re same (.1).	0.60	1145.00	\$687.00
12/10/2020	IDK	BL	E-mails with attorneys re revised removal motion and outstanding issues re same.	0.20	1145.00	\$229.00
12/10/2020	JNP	BL	Review and comment on John A. Morris argument notes.	0.10	1075.00	\$107.50
12/10/2020	JNP	BL	Conference with Ira D. Kharasch regarding opposition to Dondero ordinary course motion.	0.10	1075.00	\$107.50
12/10/2020	JNP	BL	Participate in Dondero injunction hearing.	2.40	1075.00	\$2,580.00
12/10/2020	JNP	BL	Conference with J. Dubel after Dondero injunction hearing.	0.10	1075.00	\$107.50
12/10/2020	JNP	BL	Conference with Ira D. Kharasch after Dondero	0.10	1075.00	\$107.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			injunction hearing.			
12/10/2020	JNP	BL	Conference with Wilmer Hale, Kasowitz, John A. Morris, H. Winograd and Gregory V. Demo regarding CLO motion.	0.50	1075.00	\$537.50
12/10/2020	JNP	BL	Conference with Gregory V. Demo, H. Winograd, Ira D. Kharasch and John A. Morris regarding planning for hearing in connection with CLO motion and Dondero ordinary course motion.	0.40	1075.00	\$430.00
12/10/2020	JNP	BL	Conference with John A. Morris regarding email from M. Lynn regarding asset sales.	0.10	1075.00	\$107.50
12/10/2020	JNP	BL	Conference with J. Seery regarding email from M. Lynn and proposed response.	0.30	1075.00	\$322.50
12/10/2020	JNP	BL	Draft email to M. Lynn regarding request to halt asset sales and emails regarding same.	0.30	1075.00	\$322.50
12/10/2020	JNP	BL	Revise intro to brief in opposition to Dondero motion.	0.50	1075.00	\$537.50
12/10/2020	JNP	BL	Conference with Ira D. Kharasch and Richard M. Pachulski regarding Dondero hearing.	0.20	1075.00	\$215.00
12/10/2020	JNP	BL	Conference with Gregory V. Demo regarding Dondero ordinary course motion.	0.10	1075.00	\$107.50
12/10/2020	JNP	BL	Conference with J. Dubel regarding Dondero hearing and pending motion.	0.30	1075.00	\$322.50
12/10/2020	JNP	BL	Conference with John A. Morris regarding Dondero pending motion.	0.10	1075.00	\$107.50
12/10/2020	JEO	BL	Revisions to Highland Removal extension motion	1.20	925.00	\$1,110.00
12/10/2020	JMF	BL	Review and comment re removal extension.	0.40	925.00	\$370.00
12/10/2020	JMF	BL	Review HCRE stipulation and protective order.	0.20	925.00	\$185.00
12/10/2020	JAM	BL	Draft outline for Opening in connection with motion for TRO against Dondero (1.5); prepare for hearing (1.0); e-mails to J. Seery, I. Kharasch, G. Demo re: outline for Opening in connection with motion for TRO against Dondero (0.1); e-mail to D. Klos, J. Seery, T. Jeremiassen, R. Romey re: meeting with FTI/Sidley (0.1); review/revise draft objection to Dondero section 363 motion (0.8); e-mail to J. Pomerantz, I. Kharasch, G. Demo re: revisions to draft objection to Dondero section 363 motion (0.1); court hearing on Debtor's motion for TRO and related matters (2.3); telephone conference with J.	8.80	1075.00	\$9,460.00

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Seery, G. Demo re: court hearing and follow up issues (0.4); telephone conference with J. Pomerantz re: court hearing (0.1); telephone conference with J. Pomerantz, G. Demo, Y. Itkin, T. Silva re: CLO issues (0.5); telephone conference with J. Pomerantz, I. Kharasch, G. Demo re: discovery, next week's hearings (0.4); review TRO and communications with Z. Annable re: same (0.1); e-mail to K&L Gates, J. Pomerantz, G. Demo re: discovery on Advisors' motion (0.2); e-mails with D. Klos, T. Jeremiassen, J. Romey re: meeting with FTI/Sidley and discovery (0.1); e-mails with P. Montgomery, C. Rognes re: document production (0.1); e-mails with E. Weinberger, D. Stroik, G. Demo re: protective order and confidential information (0.1); e-mails with J. Pomerantz, I. Kharasch, G. Demo re: M. Lynn communications and discovery (0.3); telephone conference with H. Winograd re: legal research for opposition to Daugherty lift stay motion (0.3); telephone conference with G. Demo re: litigation matters (0.2); telephone conference with J. Pomerantz re: upcoming litigation issues (0.1).						
12/10/2020	GIG	BL	Emails Ira D. Kharasch re jurisdiction memo	0.10	895.00	\$89.50
12/10/2020	GVD	BL	Draft outline re response to NPA on CLO issues	0.90	825.00	\$742.50
12/10/2020	GVD	BL	Review NPA motion on CLO standstill	0.50	825.00	\$412.50
12/10/2020	GVD	BL	Revise and circulate response to Dondero 363 motion	1.50	825.00	\$1,237.50
12/10/2020	GVD	BL	Review outline for presentation at hearing	0.40	825.00	\$330.00
12/10/2020	GVD	BL	Conference with J. Morris re litigation strategy	0.30	825.00	\$247.50
12/10/2020	GVD	BL	Review correspondence to M. Lynn re Dondero issues	0.10	825.00	\$82.50
12/10/2020	GVD	BL	Conference with WilmerHale/Kasowitz re response to CLO motion	0.50	825.00	\$412.50
12/10/2020	GVD	BL	Conference with J. Morris and J. Seery re follow up to TRO hearing	0.40	825.00	\$330.00
12/10/2020	GVD	BL	Attend hearing on Dondero TRO	2.20	825.00	\$1,815.00
12/10/2020	JE	BL	Consolidate and write up additional research on property of the estate, standing and ordinary course of business (3.8); review and revise several drafts of response to Dondero motion (1.6); miscellaneous correspondence regarding same (.5); review report	6.10	1100.00	\$6,710.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			of TRO hearing (.2).			
12/10/2020	HRW	BL	Call with J. Morris re: opposition to Daugherty stay lift motion (0.2); Dondero TRO Hearing (1.5); Draft deposition notice for Dustin Norris (1.3).	3.00	625.00	\$1,875.00
12/11/2020	IDK	BL	E-mails with J Morris re his suggested changes to opposition to Dondero 363 motion, including mine and others feedback, and status of Board feedback re Lynn counter-proposal to resolve (.4); Review of UCC opposition to Dondero 363 motion (.2).	0.60	1145.00	\$687.00
12/11/2020	IDK	BL	Telephone conference with J. Pomerantz re issues on negotiations with Dondero on CLOs/ordinary course motion (.1); Attend part of conference call with attorneys on various pending litigation with Dondero and his 363 motion, and CLO motion to stop trading (.4); E-mails with J Morris and CEO re discovery to go out re NPA motion to stop CLO trades (.1).	0.60	1145.00	\$687.00
12/11/2020	IDK	BL	E-mail to Dondero counsel re depos (.1); E-mails with attorneys re same and taking other depos, and issues re same, and info on moving parties "independent" boards (.3).	0.40	1145.00	\$458.00
12/11/2020	IDK	BL	Review and consider G Demo draft of response to NPA motion to prevent CLO trading (.3); E-mail to G Demo re my feedback on changes to be made, and feedback of others (.3).	0.60	1145.00	\$687.00
12/11/2020	JNP	BL	Conference with J. Dubel regarding pending litigation matters.	0.20	1075.00	\$215.00
12/11/2020	JNP	BL	Conference with Gregory V. Demo regarding pending litigation matters.	0.10	1075.00	\$107.50
12/11/2020	JNP	BL	Review opposition to Dondero ordinary course motion.	0.10	1075.00	\$107.50
12/11/2020	JNP	BL	Conference with John A. Morris, Gregory V. Demo, Ira D. Kharasch and H. Winograd regarding pending litigation matters.	0.50	1075.00	\$537.50
12/11/2020	JNP	BL	Conference with J. Seery, Gregory V. Demo, John A. Morris and H. Winograd regarding pending litigation issues.	0.70	1075.00	\$752.50
12/11/2020	JNP	BL	Review letter from HCLOF.	0.10	1075.00	\$107.50
12/11/2020	JNP	BL	Review Committee brief regarding Dondero motion.	0.10	1075.00	\$107.50
12/11/2020	RMP	BL	Conference with I. Kharasch re Dondero litigation.	0.40	1445.00	\$578.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/11/2020	JMF	BL	Review opposition to motion to prohibit ordinary course transactions.	0.30	925.00	\$277.50
12/11/2020	JAM	BL	Review/revise draft objection to Dondero 363 motion (0.7); e-mail to J. Pomerantz, I. Kharasch, G. Demo re: JAM comments to draft objection to Dondero 363 motion (0.1); review stipulation concerning resolution of Daugherty Adversary Proceeding No. 2 (0.1); e-mail to Z. Annable, J. Pomerantz, G. Demo re: stipulation concerning resolution of Daugherty Adversary Proceeding No. 2 (0.1); e-mails with J. Pomerantz, I. Kharasch, G. Demo re: Dondero 363 motion (0.2); review/revise deposition notice for Advisors (0.3); e-mails with L. Canty, Z. Annable, J. Pomerantz, G. Demo, H. Winograd re: deposition notice for Advisors (0.1); telephone conference with G. Demo re: litigation matters (0.2); telephone conference with J. Seery re: litigation matters (0.1); work on objection to Daugherty lift stay motion (3.6); draft deposition notice for James Dondero (0.2); e-mails with Dondero's counsel re: discovery (0.2); telephone conference with J. Pomerantz, Redeemer counsel, UBS counsel re: Redeemer intervention on UBS appeal of Rule 9019 order (0.2); telephone conference with J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: litigation matters, strategy (0.5); telephone conference with J. Seery, J. Pomerantz, G. Demo, H. Winograd re: litigation matters, strategy (0.7); telephone conference with B. Assink re: meet and confer over discovery on Dondero motion (0.3); e-mails with B. Assink re: meet and confer over discovery on Dondero motion (0.2); communications with J. Wright, Pomerantz, G. Demo, H. Winograd re: discovery for Advisors' hearing (0.3).	8.10	1075.00	\$8,707.50
12/11/2020	GIG	BL	Emails with Gregory V. Demo re jurisdiction question, review memo re same	0.20	895.00	\$179.00
12/11/2020	GVD	BL	Review offering memoranda re CLO litigation	0.40	825.00	\$330.00
12/11/2020	GVD	BL	Finalize response to Dondero 363 motion and file same	1.20	825.00	\$990.00
12/11/2020	GVD	BL	Review research re bankruptcy jurisdiction	0.30	825.00	\$247.50
12/11/2020	GVD	BL	Conduct research re CLO litigation	1.50	825.00	\$1,237.50
12/11/2020	GVD	BL	Draft response re CLO litigation	2.60	825.00	\$2,145.00

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12/11/2020	GVD	BL	Multiple conferences with PSZJ and J. Seery re litigation strategy and next steps	1.20	825.00	\$990.00
12/11/2020	GVD	BL	Revise and circulate outline re CLO motion	0.20	825.00	\$165.00
12/11/2020	JE	BL	Discuss TRO ruling with Mr. Pomerantz.	0.20	1100.00	\$220.00
12/11/2020	HRW	BL	Draft document requests to NexPoint Advisors and related parties (1.8); PSZJ litigation update call (1.0); Call with G. Demo re: document requests to NexPoint Advisors and related parties (0.1).	2.90	625.00	\$1,812.50
12/12/2020	IDK	BL	Numerous E-mails with CEO, J Morris re communications with Dondero counsel on their changing depo demands/ideas of today (.2); Numerous E-mails with attorneys re draft of potential settlement proposal to Dondero re sales, and issues/problems with same and fiduciary out issues (.2).	0.40	1145.00	\$458.00
12/12/2020	IDK	BL	E-mails with Board re its feedback on potential settlement proposal to Dondero (.1); Review of correspondence with Dondero counsels re their reaction to same proposal (.1); Telephone conference with J. Pomerantz re status on settlement negotiations re same (.1); E-mails with Board, J. Pomerantz, re how to respond to Dondero counsel's concerns re proposal to resolve (.2); E-mails with and review of correspondence with Dondero counsel on our response to their counter, and how to respond (.2).	0.70	1145.00	\$801.50
12/12/2020	JNP	BL	Draft email to Board regarding resolution to Dondero motion.	0.20	1075.00	\$215.00
12/12/2020	JNP	BL	Emails to and from M. Lynn regarding proposal to resolve Dondero motion.	0.40	1075.00	\$430.00
12/12/2020	JNP	BL	Emails with Board regarding proposal to resolve Dondero motion.	0.10	1075.00	\$107.50
12/12/2020	JNP	BL	Conference with J. Dubel regarding Dondero motion and related matters (2X).	0.60	1075.00	\$645.00
12/12/2020	JNP	BL	Conference with John A. Morris regarding Dondero proposal and response.	0.10	1075.00	\$107.50
12/12/2020	JNP	BL	Review emails regarding discovery on Dondero motion.	0.10	1075.00	\$107.50
12/12/2020	JAM	BL	E-mails with B. Assink, J. Wilson, J. Pomerantz, G. Demo, H. Winograd re: depositions (0.2); e-mails to	7.20	1075.00	\$7,740.00

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			J. Seery, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: depositions for Dondero motion (0.1); amend Notice of Deposition for Dondero and communications with Z. Annable concerning the same (0.2); e-mail to L. Canty, G. Demo, H. Winograd re: depositions, court reporter (0.2); work on Objection to Daugherty Lift Stay Motion (4.7); telephone conference with J. Seery re: negotiations concerning Dondero motion (0.5); telephone conference with L. Canty re: depositions (0.1); e-mails to B. Assink, J. Wilson, J. Pomerantz, G. Demo re: depositions (0.4); e-mails with J. Seery, J. Dubel, R. Nelms, J. Pomerantz, I. Kharasch. G. Demo re: negotiations concerning Dondero (0.5); e-mails with J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: draft Objection to Daugherty Lift Stay Motion (0.2); telephone conference with L. Canty re: depositions (0.1).			
12/12/2020	GVD	BL	Research and draft response to NexPoint CLO motion	6.10	825.00	\$5,032.50
12/12/2020	GVD	BL	Conference with U. Itkin re status of insert to NexPoint CLO motion	0.20	825.00	\$165.00
12/12/2020	HRW	BL	Draft opposition to Daugherty stay relief motion (7.5).	7.50	625.00	\$4,687.50
12/13/2020	IDK	BL	Review of further correspondence with Dondero counsels re discovery and depo issues re 363 motion (.1); E-mails with Board re same and finalized deposition schedule tomorrow (.1); E-mails with Board, J Morris re new subpoena for Caruso, Sevilla, and our intention to prepare motions to quash/protective order (.2).	0.40	1145.00	\$458.00
12/13/2020	IDK	BL	E-mails with G Demo re status on our response to NPA motion re CLO sales, and its prior position in Acis on same.	0.20	1145.00	\$229.00
12/13/2020	IDK	BL	E-mails with G Demo re his draft response to NPA/HCMFA motion re CLO sales, including J. Pomerantz comments to same.	0.30	1145.00	\$343.50
12/13/2020	JNP	BL	Review letter from Next Point regarding claims and review and revise proposed response.	0.20	1075.00	\$215.00
12/13/2020	JNP	BL	Review and revise opposition to CLO motion.	1.00	1075.00	\$1,075.00
12/13/2020	JNP	BL	Conference with John A. Morris regarding discovery in connection with Dondero motion and CLO motion.	0.20	1075.00	\$215.00

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12/13/2020	JNP	BL	Review TRO transcript.	0.20	1075.00	\$215.00
12/13/2020	JAM	BL	Telephone conference with J. Dubel re: Dondero litigation tactics (0.2); telephone conference with G. Demo re: litigation issues (0.4); telephone conference with J. Pomerantz re: Dondero litigation tactics (0.2); telephone conference with J. Seery re: Dondero litigation (0.2); e-mails with all counsel re: deposition instructions (0.2); review/revise witness and exhibit list (0.2); e-mail to Z. Annable, L. Canty, G. Demo, H. Winograd re: witness and exhibit list (0.1); prepare for depositions (0.4).	1.90	1075.00	\$2,042.50
12/13/2020	GVD	BL	Draft response to K&L Gates demand letter	0.20	825.00	\$165.00
12/13/2020	GVD	BL	Further research and revise response to NPA motion on CLOs	2.60	825.00	\$2,145.00
12/13/2020	GVD	BL	Conference with U. Itkin re CLOs	0.40	825.00	\$330.00
12/13/2020	HRW	BL	Draft opposition to Daugherty stay relief motion (4.5); Call with J. Morris re: opposition to Daugherty stay relief motion (0.1).	4.60	625.00	\$2,875.00
12/14/2020	IDK	BL	E-mails with Board, others re J Morris draft of motion to quash and for protective order, including brief review of same, and feedback for changes (.3); E-mails with J Morris and local counsel re status of feedback from chambers on same motion, including later court's direction on same, and Dondero agreement to expedited hearing (.3).	0.60	1145.00	\$687.00
12/14/2020	IDK	BL	Review and consider numerous correspondence with Dondero counsels re our motion to quash and their continued insistence on depositions of others, as well as various new proposals from Dondero counsels re temporary resolution of the 363 motion, including feedback from Board and attorneys as to how to respond (.5); Review of further various correspondence with Dondero counsel re our issues with their proposal and Dondero's prior interference, as well as scheduling of call tomorrow (.3).	0.80	1145.00	\$916.00
12/14/2020	IDK	BL	E-mails with Board and attorneys re Dondero opposition to motion to quash, including brief review of same, and Dondero proposal to continue contained therein, including problems on same and how to respond.	0.30	1145.00	\$343.50
12/14/2020	IDK	BL	E-mails with J Morris re questions for upcoming Dondero deposition, and issue of J Terry attendance and Board feedback.	0.20	1145.00	\$229.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/14/2020	IDK	BL	Telephone conference with J Pomerantz re result of Seery deposition re Dondero motion (.1); Attend internal conference call with attorneys re status of litigation hearings for 12/16, and today's motion to quash re Dondero, and prep for hearings on 12/16 (.4).	0.50	1145.00	\$572.50
12/14/2020	IDK	BL	Telephone conference with J. Pomerantz re result of Board call on motion to quash (.1); Telephone conference with J. Pomerantz in break of Dondero deposition of questions needed to be asked (.1); Telephone conference with J. Pomerantz re result of deposition on the opposition to NPA motion re CLOs (.1).	0.30	1145.00	\$343.50
12/14/2020	IDK	BL	Attend most of Dondero deposition (1.5).	1.50	1145.00	\$1,717.50
12/14/2020	IDK	BL	E-mails with G Demo re questions on our draft response to NPA motion re CLOs, including review of his revised response re same (.3); E-mails with G Demo, J. Pomerantz re my comments to revised draft and timing of running by CEO and others, including review of correspondence to same (.3).	0.60	1145.00	\$687.00
12/14/2020	JNP	BL	Review motion to quash.	0.10	1075.00	\$107.50
12/14/2020	JNP	BL	Conference with John A. Morris regarding motion to quash.	0.10	1075.00	\$107.50
12/14/2020	JNP	BL	Conference with J. Dubel regarding pending litigation matters.	0.20	1075.00	\$215.00
12/14/2020	JNP	BL	Listen in to J. Seery deposition.	1.60	1075.00	\$1,720.00
12/14/2020	JNP	BL	Conference with Ira D. Kharasch regarding J. Seery deposition.	0.10	1075.00	\$107.50
12/14/2020	JNP	BL	Conference with Ira D. Kharasch, John A. Morris, Gregory V. Demo and H. Winograd regarding litigation planning.	0.40	1075.00	\$430.00
12/14/2020	JNP	BL	Conference with Board, John A. Morris and Gregory V. Demo regarding Dondero proposal.	0.30	1075.00	\$322.50
12/14/2020	JNP	BL	Email to and from M. Lynn regarding proposal.	0.10	1075.00	\$107.50
12/14/2020	JNP	BL	Participate in J. Dondero deposition.	2.00	1075.00	\$2,150.00
12/14/2020	JNP	BL	Conference with Ira D. Kharasch after j. Dondero deposition.	0.10	1075.00	\$107.50
12/14/2020	JNP	BL	Conference with J. Dubel after J. Dondero	0.10	1075.00	\$107.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			deposition.			
12/14/2020	JNP	BL	Review Dondero opposition to motion to quash.	0.10	1075.00	\$107.50
12/14/2020	JNP	BL	Conference with John A. Morris regarding Dondero opposition and motion to quash.	0.20	1075.00	\$215.00
12/14/2020	JNP	BL	Email to Gregory V. Demo regarding Dondero opposition to motion to quash.	0.10	1075.00	\$107.50
12/14/2020	JMF	BL	Review motion to quash (.3) and opposition to same (.2).	0.50	925.00	\$462.50
12/14/2020	JMF	BL	Review request re temporary restrictions on non debtor CLO vehicle sales.	0.40	925.00	\$370.00
12/14/2020	JAM	BL	Draft motion for a protective order/motion to quash subpoenas (3.5); telephone conference with J. Pomerantz re: draft motion for a protective order/motion to quash subpoenas (0.1); review/revise draft motion for a protective order/motion to quash subpoenas (0.1); e-mails with Board, J. Pomerantz, I. Kharasch, G. Demo re: draft motion for a protective order/motion to quash subpoenas (0.1); communications with Z. Annable, H. Winograd, G. Demo re: draft motion for a protective order/motion to quash subpoenas (0.2); prepare for Dondero deposition (1.6); telephone conference with J. Seery re: deposition (0.1); Seery deposition (1.6); telephone conference with J. Seery re: deposition (0.2); telephone conference with J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: Seery deposition (0.3); telephone conference with Board, J. Pomerantz, I. Kharasch, G. Demo re: potential settlement with Dondero (0.3); prepare for Dondero deposition (1.4); Dondero deposition (2.0); e-mails with L. Canty re: exhibit and witness list (0.2); telephone conference with G. Demo, Cameron, Sean re: Norris deposition (0.4); review objection to motion for protective order/motion to quash (0.2); telephone conference with J. Seery re: depositions (0.5).	12.80	1075.00	\$13,760.00
12/14/2020	GVD	BL	Attend Dondero deposition (partial)	1.50	825.00	\$1,237.50
12/14/2020	GVD	BL	Revise and circulate response to CLO motion	5.00	825.00	\$4,125.00
12/14/2020	GVD	BL	Conference with J. Morris re preparation for Norris deposition	0.60	825.00	\$495.00
12/14/2020	GVD	BL	Correspondence with J. Pomerantz re current protocols	0.10	825.00	\$82.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/14/2020	GVD	BL	Review motion re Daugherty automatic stay	0.20	825.00	\$165.00
12/14/2020	GVD	BL	Conference with Board re Dondero motion and potential resolution	0.30	825.00	\$247.50
12/14/2020	GVD	BL	Review exhibit list re CLO motion	0.20	825.00	\$165.00
12/14/2020	GVD	BL	Attend to issues re potential resolution of Dondero motion	0.20	825.00	\$165.00
12/14/2020	HRW	BL	Edit and review opposition to Daugherty stay relief motion (1.1); PSZJ call re: Deposition Prep (0.4); PSZJ call re: Motion to Quash (0.3); Seery deposition (1.4); Dondero deposition (1.5); Review NPA/CLO pleadings (0.8); Review Dondero section 363 pleadings (0.6).	6.10	625.00	\$3,812.50
12/15/2020	IDK	BL	E-mails with Board, others re court's partial ruling on our motion to quash, and next steps (.2); Review of correspondence with Dondero counsel re their cancellation of call, and court's ruling on motion to quash re same (.2); Telephone conference with J. Pomerantz re Dondero request to speak to entire Board (.1); Review of numerous correspondence with Dondero counsel re his request to speak to non-Seery board members, and willingness to continue hearing on 363 motion, and next steps re implementing same (.3).	0.80	1145.00	\$916.00
12/15/2020	IDK	BL	E-mails with Board, J Morris re status on tomorrow's hearing (.1); E-mails with same re order to adjourn same hearing (.1); E-mails with attorneys re Dondero counsel disputes with form of order on same and related discovery issues (.2).	0.30	1145.00	\$343.50
12/15/2020	IDK	BL	E-mails with J Morris re his correspondence with internal staff on pushback on UCC discovery, including review of same, and how to respond (.2); Telephone conference with J. Pomerantz re problems on UCC discovery on employees and Klos position and next steps (.2).	0.40	1145.00	\$458.00
12/15/2020	IDK	BL	Review of correspondence with DSI, J. Pomerantz re asset sale summaries re NPA motion to restrict CLO sales (.2); E-mail to G Demo re prior stipulation with Dondero re Strand (.1); Review of G Demo's draft of oral argument for tomorrow's hearing with NPA and consider, as well as feedback from J. Pomerantz re same (.3).	0.60	1145.00	\$687.00
12/15/2020	IDK	BL	E-mails with G Demo re my comments and Board feedback to revised motion to extend removal	0.30	1145.00	\$343.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			deadline, including review of such motion.			
12/15/2020	JNP	BL	Conference with John A. Morris regarding deposition.	0.10	1075.00	\$107.50
12/15/2020	JNP	BL	Participating in deposition of Dustin Norris.	2.70	1075.00	\$2,902.50
12/15/2020	JNP	BL	Conference with J. Dubel regarding Dondero motion and next steps.	0.20	1075.00	\$215.00
12/15/2020	JNP	BL	Emails to and from M. Lynn regarding resolution of Dondero motion.	0.10	1075.00	\$107.50
12/15/2020	JNP	BL	Conference with CLO issuers counsel, Ira D. Kharasch and Gregory V. Demo regarding status and moving forward.	0.60	1075.00	\$645.00
12/15/2020	JNP	BL	Review Gregory V. Demo outline for CLO hearing and provide comments.	0.50	1075.00	\$537.50
12/15/2020	JNP	BL	Conference with M. Clemente regarding discovery issues.	0.20	1075.00	\$215.00
12/15/2020	JNP	BL	Emails to and from M. Lynn regarding hearing resolution and request for Board meeting.	0.50	1075.00	\$537.50
12/15/2020	JNP	BL	Emails to and from PSZJ team regarding pending litigation; Calls with Gregory V. Demo and John A. Morris regarding same.	0.50	1075.00	\$537.50
12/15/2020	JNP	BL	Review order regarding Dondero motion; Conference with John A. Morris regarding same.	0.10	1075.00	\$107.50
12/15/2020	JNP	BL	Conference with Ira D. Kharasch regarding pending litigation issues.	0.10	1075.00	\$107.50
12/15/2020	JNP	BL	Review and respond to several emails with M. Lynn regarding Order on Dondero motion.	0.50	1075.00	\$537.50
12/15/2020	RMP	BL	Conference with I. Kharasch re litigation status.	0.20	1445.00	\$289.00
12/15/2020	BEL	BL	Telephone conference with John A. Morris regarding complaint regarding demand notes.	0.20	825.00	\$165.00
12/15/2020	BEL	BL	Review demand notes.	0.50	825.00	\$412.50
12/15/2020	JMF	BL	Review removal extension motion.	0.30	925.00	\$277.50
12/15/2020	JMF	BL	Review opposition to motion to restrain ordinary course training.	0.40	925.00	\$370.00
12/15/2020	JMF	BL	Review docket re CLO sales and draft memorandum re case issues (.6); telephone call with G. Demo, J.N. Pomerantz, I. Kharasch, J. O'Neill, H. Winograd re	1.60	925.00	\$1,480.00

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			same (.6); telephone call with J. Donahue, I. Kharasch, G. Demo, James Romey (.4).			
12/15/2020	JAM	BL	Prepare for Norris deposition (3.8); telephone conference with G. Demo re: Norris deposition (0.1); telephone conference with J. Dubel re: status of hearing, motion for protective order (0.1); e-mails with J. Pomerantz, I. Kharasch, G. Demo, M. Lynn re: issues related to Dondero and hearing (0.3); Norris deposition (1.7); telephone conference with J. Pomerantz re: Norris deposition (0.1); telephone conference with G. Demo re: Norris deposition (0.1); telephone conference with D. Draper re: Dugaboy, Get Good document productions (0.1); telephone conference with B. Levine re: collection actions on demand notes (0.1); telephone conference with J. Seery re: document production (0.1); telephone conference with G. Demo, J. Romey re: document production (0.1); telephone conference with G. Demo re: document production and related matters (0.1); telephone conference with J. Dubel, J. Pomerantz re: discovery issues and related matters (0.4); telephone conference with Board, J. Pomerantz, I. Kharasch, G. Demo re: employee issues, discovery (0.7); telephone conference with J. Seery re: employee issues, discovery (0.2); telephone conference with P. Montgomery re: meeting with FTI (0.1); telephone conference with J. Seery re: discovery issues (0.1); review/revise draft order adjourning Dondero Rule 363 motion (0.4); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: draft order adjourning Dondero Rule 363 motion (0.1); telephone conference with J. Seery re: Klos and FTI meeting (0.1); e-mails with J. Seery, D. Klos, D. Neier re: Klos and FTI meeting (0.1); telephone conference with P. Montgomery re: FTI meeting (0.1); review G. Demo draft opening statement for hearing on NexPoint motion (0.2).	9.20	1075.00	\$9,890.00
12/15/2020	GVD	BL	Prepare for hearing re CLO standstill	2.40	825.00	\$1,980.00
12/15/2020	GVD	BL	Revise and file objection to CLO motion	0.70	825.00	\$577.50
12/15/2020	GVD	BL	Review and revise deposition outline re D. Norris	0.70	825.00	\$577.50
12/15/2020	GVD	BL	Attend deposition of D. Norris (partial)	1.50	825.00	\$1,237.50
12/15/2020	GVD	BL	Conference with J. Morris and J. Pomerantz re discovery issues	0.30	825.00	\$247.50
12/15/2020	HRW	BL	Draft proposed order to adjourn Dondero motion (2.3); D. Norris Deposition (2.0).	4.30	625.00	\$2,687.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/16/2020	IDK	BL	E-mails with Board, others on temporary resolution of UCC discovery and employee role in same.	0.10	1145.00	\$114.50
12/16/2020	IDK	BL	E-mails with G Demo, others on his revised summary of his oral argument for today's hearing on NPA motion, including my feedback, questions on same.	0.30	1145.00	\$343.50
12/16/2020	IDK	BL	Review and consider Dondero just filed motion to modify TRO to communicate with Board (.2); E-mails with CEO, others re same and next steps (.2).	0.40	1145.00	\$458.00
12/16/2020	IDK	BL	E-mails with internal team on need for hearing prep call (.1); Attend conference call with J. Pomerantz, G Demo and J Morris re prep for today's hearing on NPA/HCLOF motion re CLOs (.4); Attend hearing today re same (1.7); Office conference with J. Pomerantz re same (.1).	2.30	1145.00	\$2,633.50
12/16/2020	IDK	BL	E-mails with Dondero counsel, J. Pomerantz re Lynn's request to speak to entire Board.	0.10	1145.00	\$114.50
12/16/2020	IDK	BL	E-mail to J Morris re result of UCC counsel interview with Klos (.1).	0.10	1145.00	\$114.50
12/16/2020	IDK	BL	Review and consider briefly extensive UBS correspondence re both MS settlement concerns and CDO Fund collection re judgment (.2); Review briefly extensive correspondence with Board, others re legal issues on CDO collection efforts by UBS, and possible responses (.2).	0.40	1145.00	\$458.00
12/16/2020	JNP	BL	Review revisions to Gregory V. Demo opening on CLO motion.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	Review emails regarding modifications to Order on Dondero motion.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	Conference with Gregory V. Demo regarding CLO motion and J. Seery call with HCLOF.	0.20	1075.00	\$215.00
12/16/2020	JNP	BL	Conference with Gregory V. Demo, Ira D. Kharasch and John A. Morris regarding hearing preparation.	0.40	1075.00	\$430.00
12/16/2020	JNP	BL	Review Dondero motion to amend TRO.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	Participate in hearing on CLO motion.	1.90	1075.00	\$2,042.50
12/16/2020	JNP	BL	Conference with Gregory V. Demo regarding UBS (2x).	0.20	1075.00	\$215.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/16/2020	JNP	BL	Conference with Gregory V. Demo regarding CLO Holdco demand.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	Conference with J. Dubel regarding hearing and UBS, and hearing (several).	1.30	1075.00	\$1,397.50
12/16/2020	JNP	BL	Conference with John A. Morris regarding hearing and related issues.	0.20	1075.00	\$215.00
12/16/2020	JNP	BL	Review issues relating to UBS letter asking for assistance in transferring assets.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	Email from M. Lynn regarding communications with Board and forward to Board.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	Review Order regarding hearing on CLO motion.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	.Email to Z. Anabale regarding Order resolving Dondero motion and motion to quash.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	Conference with .J. Seery regarding UBS, hearing and related.	0.30	1075.00	\$322.50
12/16/2020	JNP	BL	Conference with Ira D. Kharasch regarding UBS and litigation issues.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	Review demand letters from CLO Holdco.	0.10	1075.00	\$107.50
12/16/2020	JNP	BL	Email to Board regarding CLO Fund and SOHC issues.	0.10	1075.00	\$107.50
12/16/2020	KKY	BL	Serve (.1) and prepare for service (.1) removal extension motion	0.20	425.00	\$85.00
12/16/2020	KKY	BL	Draft (.1) and prepare for filing (.1) certificate of service for removal extension motion	0.20	425.00	\$85.00
12/16/2020	RMP	BL	Conferences with J. Pomerantz and I. Kharasch re pending motions and responses thereto.	0.60	1445.00	\$867.00
12/16/2020	BEL	BL	Review notes and draft complaint.	3.70	825.00	\$3,052.50
12/16/2020	JAM	BL	Prepare for hearing on CLO motion (6.2); telephone conference with J. Donohue re: discovery meeting with UCC (0.1); telephone conference with G. Demo re: today's hearing (0.1); telephone conference with D. Klos, D. Neier re: discovery meeting with UCC (0.3); telephone conference with J. Pomerantz, I. Kharasch, G. Demo re: preparation for hearing (0.3); telephone conference with J. Seery re: preparation for hearing (0.2); review Demo draft opening statement for CLO hearing (0.2); telephone conference with G. Demo re: opening statement	12.50	1075.00	\$13,437.50

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			(0.1); review/revise proposed order on Dondero-related motions (0.2); e-mail to Bond Ellis, J. Pomerantz, I. Kharasch, G. Demo re: proposed order on Dondero-related motions (0.1); court hearing on Dondero-related motion and CLO motion (1.8); telephone conference with J. Seery re: CLO hearing (0.3); telephone conference with J. Dubel re: CLO hearing (0.2); telephone conference with J. Pomerantz re: CLO hearing (0.1); telephone conference with D. Draper re: Dugaboy and Get Good document production (0.1); e-mails with J. Seery, DSI, HCMLP personnel re: discovery (0.1); telephone conference with Z. Annable re: Daugherty lift stay motion (0.1); e-mails with J. Kathman, Z. Annable, J. Pomerantz, I. Kharasch, G. Demo re: Daugherty lift stay motion (0.2); telephone conference with D. Klos, D. Neier, Sidley, FTI re: discovery (0.8); e-mail to Board, J. Pomerantz, I. Kharasch, G. Demo re: discovery call with UCC (0.1); telephone conference with I. Leventon re: CLO hearing, Daugherty lift stay motion (0.3); telephone conference with J. Seery re: UCC discovery meeting (0.1); e-mail to J. Kathman re: Stipulation, proposed order concerning Adversary Proceeding No. 2 (0.1); review/revise proposed Order on CLO motion (0.3); e-mails with J. Pomerantz, I. Kharasch, G. Demo, Z. Annable re: proposed order on CLO motion (0.1).			
12/16/2020	GVD	BL	Review D. Norris transcript in preparation for hearing	0.50	825.00	\$412.50
12/16/2020	GVD	BL	Prepare for hearing re CLO motion	2.10	825.00	\$1,732.50
12/16/2020	GVD	BL	Correspondence re affiliate status under CLO agreements	0.30	825.00	\$247.50
12/16/2020	GVD	BL	Conference with J. Pomerantz re preparation for hearing	0.20	825.00	\$165.00
12/16/2020	GVD	BL	Attend hearing re CLO issues	1.60	825.00	\$1,320.00
12/16/2020	GVD	BL	Conference with J. Morris and J. Seery re follow up to hearing	0.20	825.00	\$165.00
12/16/2020	GVD	BL	Multiple conferences with J. Pomerantz re UBS demand letters	0.20	825.00	\$165.00
12/16/2020	GVD	BL	Draft multiple emails re UBS demand letters	1.00	825.00	\$825.00
12/16/2020	HRW	BL	Draft proposed order denying CLO Motion (1.5); Hearing on CLO Motion (1.8).	3.30	625.00	\$2,062.50

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12/17/2020	IDK	BL	E-mails with local counsel re court's order denying Dondero emergency hearing on motion to modify tentative and setting on January 4.	0.10	1145.00	\$114.50
12/17/2020	JNP	BL	Email to Elissa A. Wagner regarding response to UBS letters.	0.10	1075.00	\$107.50
12/17/2020	JNP	BL	Conference with Robert J. Feinstein regarding UBS letters.	0.20	1075.00	\$215.00
12/17/2020	BEL	BL	Draft, review and revise complaint.	3.20	825.00	\$2,640.00
12/17/2020	JAM	BL	Prepare for hearing on Daugherty Lift Stay Motion (0.8); e-mail to J. Pomerantz, I. Kharasch, G. Demo re: Daugherty lift stay hearing (0.1); e-mails with J. Wright, G. Demo, Z. Annable re: order on CLO motion (0.1); hearing on Daugherty lift stay motion (1.2); telephone conference with J. Pomerantz re: Daugherty lift stay motion, other potential litigation matters (0.3); telephone conference with J. Seery re: Daugherty lift stay motion and other potential litigation matters (0.1).	2.60	1075.00	\$2,795.00
12/17/2020	GVD	BL	Attend hearing re Daugherty relief from stay	1.20	825.00	\$990.00
12/17/2020	HRW	BL	Draft proposed order denying Daugherty Lift Stay Motion (0.8); Hearing on Daugherty Lift Stay Motion (1.0).	1.80	625.00	\$1,125.00
12/18/2020	IDK	BL	E-mails with J Morris re draft amended complaint vs Dondero and UCC complaint re Holdco.	0.20	1145.00	\$229.00
12/18/2020	JMF	BL	Review motion to seal and preliminary injunction motion re CLO Holdco.	0.40	925.00	\$370.00
12/18/2020	JAM	BL	E-mail to J. Kathman re: proposed Order on Daugherty Lift Stay motion (0.1); prepare Amended Complaint against Dondero to extend injunctive relief to Successor Parties (as defined in the Amended Complaint) (0.8); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: proposed Amended Complaint against Dondero (0.1); review UCC's complaint and motion for injunctive relief against CLO HoldCo and related entities (0.5); e-mail to Board, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: UCC's complaint and motion for injunctive relief against CLO HoldCo and related entities (0.1); telephone conference with P. Montgomery, C. Rognes re: sealing issues pertaining to UCC's complaint against CLO HoldCo and related entities (0.2); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: UCC	2.10	1075.00	\$2,257.50

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			pleadings and confidentiality (0.1); e-mail to S. Vitiello, I. Leventon, T. Jeremiassen, J. Romey re: Get Good and Dugaboy document production (0.1); e-mail with D. Draper re: Get Good and Dugaboy document productions (0.1).			
12/18/2020	GVD	BL	Multiple conferences with J. Pomerantz, I. Kharasch, and J. Seery re potential litigation issues and next steps	0.70	825.00	\$577.50
12/18/2020	HRW	BL	PSZJ call with Debevoise re: HarbourVest settlement (0.5).	0.50	625.00	\$312.50
12/19/2020	JAM	BL	Telephone conference with G. Demo re: litigation matters (0.2); e-mails with J. Kane, D. Draper, M. Lynn, J. Pomerantz, I. Kharasch, G. Demo re: confidentiality and UCC's suit against CLO Holdco, Dondero and others (0.3); e-mails with M. Lynn, M. Clemente, J. Bond, P. Montgomery, J. Pomerantz, G. Demo re: UCC Complaint against CLO Holdco, Dondero and others and related issues of confidentiality (0.3); review documents cited in UCC Complaint as confidential (0.2).	1.00	1075.00	\$1,075.00
12/20/2020	IDK	BL	Telephone conference with J. Pomerantz on 12/19 re general case and litigation issues, including Dondero counsel communications (.2); E-mails with J. Pomerantz and CEO re same and Moodys (.1).	0.30	1145.00	\$343.50
12/20/2020	JNP	BL	Conference with J. Seery regarding UBS, Harbourvest and other litigation related issues.	0.40	1075.00	\$430.00
12/20/2020	BEL	BL	Review rules regarding attachment and emails regarding same.	0.20	825.00	\$165.00
12/20/2020	JAM	BL	Review/revise draft Scheduling Order for litigation of Dugaboy claim objections (0.2); e-mails with G. Demo, H. Winograd, Z. Annable re: draft Scheduling Order for litigation of Dugaboy claim objections (0.2); review/revise complaint against Dondero for breach of demand notes (0.8); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd, B. Levine re: complaint against Dondero (0.1).	1.30	1075.00	\$1,397.50
12/20/2020	HRW	BL	Draft HarbourVest 9019 motion (9.9).	9.90	625.00	\$6,187.50
12/21/2020	IDK	BL	Attend conference call with J Pomerantz, G Demo, J Morris re HarbourVest claim settlement issues, 3018 motion re same, claim of HCLOM re note transfer, other issues (1.0).	1.00	1145.00	\$1,145.00
12/21/2020	JNP	BL	Review email from Latham regarding Summary	0.10	1075.00	\$107.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Judgment Order and forward to Board.			
12/21/2020	JNP	BL	Conference with Robert J. Feinstein regarding UBS Order and Latham request regarding appealability.	0.10	1075.00	\$107.50
12/21/2020	JNP	BL	Internal team on Harbourvest Settlement Agreement and other claims issues.	1.00	1075.00	\$1,075.00
12/21/2020	JNP	BL	Review Committee complaint against CLO Holdco.	0.20	1075.00	\$215.00
12/21/2020	JNP	BL	Conference with Board regarding UBS issues and go forward strategy.	0.80	1075.00	\$860.00
12/21/2020	JNP	BL	Conference with Ira D. Kharasch and Robert J. Feinstein regarding UBS issues and go forward strategy (several separate and together).	0.50	1075.00	\$537.50
12/21/2020	JNP	BL	Email to and from T. Mascherin regarding call to discuss UBS issues.	0.10	1075.00	\$107.50
12/21/2020	JNP	BL	Review draft complaint against Dondero for demand notes.	0.10	1075.00	\$107.50
12/21/2020	JNP	BL	Conference with Richard M. Pachulski regarding litigation issues and strategy.	0.30	1075.00	\$322.50
12/21/2020	RMP	BL	Conference with I. Kharasch and then J. Pomerantz re UBS issues.	0.60	1445.00	\$867.00
12/21/2020	JAM	BL	Telephone conference with J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: HarbourVest settlement, demand notes, other litigation matters (1.0); e-mails with P. Montgomery re: HCLO Holdco Complaint (0.1); e-mail to J. Seery, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: complaint against Dondero (demand notes) (0.1).	1.20	1075.00	\$1,290.00
12/21/2020	GVD	BL	Conference with PSZJ re litigation matters	1.00	825.00	\$825.00
12/21/2020	JE	BL	Correspondence with Mr. Kharasch and Mr. Glazer; research issue on breach of one related contracts excusing breach of other.	4.20	1100.00	\$4,620.00
12/21/2020	HRW	BL	Review HarbourVest 9019 motion and settlement papers (1.9); PSZJ call re: HarbourVest Settlement (1.0).	2.90	625.00	\$1,812.50
12/22/2020	IDK	BL	Telephone conference with J. Pomerantz re litigation issues re Dondero and his new behavior, UBS next steps (.3) ; Attend conference call with J. Pomerantz, R. Pachulski and G Demo re same, and potential alternatives (1.0) ; Review and consider G Demo's summary of same and next steps/tasks re same on	1.70	1145.00	\$1,946.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			UBS potential reach out to MS redeemers, and additions by J. Pomerantz re same (.2) ; E-mails with G Demo re need for info/data for starting draft letter to MS redeemers re potential sales re same, and his response (.2).			
12/22/2020	IDK	BL	E-mails with attorneys re potential sanctions re K&L Gates motion (.1).	0.10	1145.00	\$114.50
12/22/2020	IDK	BL	Review of extensive correspondence with Board re NextPoint and its related parties new correspondence on CLO management and demand for no more sales, including consider next steps.	0.20	1145.00	\$229.00
12/22/2020	IDK	BL	Review of correspondence with Dondero counsel re new interference with estate and TRO with Klos.	0.10	1145.00	\$114.50
12/22/2020	JNP	BL	Review issues regarding UBS request for determination of order status and emails regarding same.	0.20	1075.00	\$215.00
12/22/2020	JNP	BL	Conference with Ira D. Kharasch regarding litigation strategy issues	0.30	1075.00	\$322.50
12/22/2020	JNP	BL	Conference with Jenner and Ira D. Kharasch regarding UBS issues.	0.50	1075.00	\$537.50
12/22/2020	JNP	BL	Conference with J. Dubel regarding UBS litigation issues.	0.20	1075.00	\$215.00
12/22/2020	JNP	BL	Conference with Richard M. Pachulski, Ira D. Kharasch, and Gregory V. Demo regarding UBS litigation issues.	1.00	1075.00	\$1,075.00
12/22/2020	JNP	BL	Review and revise email regarding litigation strategy.	0.20	1075.00	\$215.00
12/22/2020	JNP	BL	Review letter from KL Gates regarding CLOs.	0.10	1075.00	\$107.50
12/22/2020	JNP	BL	Email to and from M. Lynn regarding Mr. Dondero violation of TRO.	0.30	1075.00	\$322.50
12/22/2020	JNP	BL	Conference with Ira D. Kharasch after Board call regarding litigation issues.	0.20	1075.00	\$215.00
12/22/2020	JNP	BL	Participate in Board call regarding various litigation issues.	1.20	1075.00	\$1,290.00
12/22/2020	RMP	BL	Conference call with team re UBS issues.	1.00	1445.00	\$1,445.00
12/22/2020	RMP	BL	Review MCSF analysis and telephone conference re same.	0.30	1445.00	\$433.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/22/2020	GVD	BL	Conference with J. Pomerantz, I. Kharasch, and R. Pachulski re litigation matters	1.00	825.00	\$825.00
12/22/2020	GVD	BL	Draft correspondence re proposed response to litigation issues	0.30	825.00	\$247.50
12/22/2020	GVD	BL	Attend Acis hearing re final decree	0.90	825.00	\$742.50
12/22/2020	JE	BL	Review cases on contract breach and prepare summary memo on same; correspondence with Mr. Glazer on issues.	6.40	1100.00	\$7,040.00
12/23/2020	IDK	BL	Telephone conference with J. Pomerantz re issues on draft letter to MS investors re UBS (.1); Review and consider briefly draft letter to UBS counsel in response to its correspondence and communications with MS investors, as well as comments to same (.2); E-mails with attorneys re need for call on same (.1); Attend conference call with internal team on draft letter to UBS counsel and issues on letter to investors in MS (.5); Attend later conference call with R Feinstein and J. Pomerantz re UBS letter on settlement just with MS and next steps (.3).	1.20	1145.00	\$1,374.00
12/23/2020	IDK	BL	Telephone conferences with J. Pomerantz re issues on draft letters re MS (.2); E-mails with G Demo re same and information needed (.1); E-mail to J Morris re draft deposition notices for Dondero, Clubock re MS (.1).	0.40	1145.00	\$458.00
12/23/2020	IDK	BL	Review of various documents, phone summaries of Dondero/Clubock statements re approaching Redeemer claimants in Multi-Strat (.3); Prep of draft letter to Redeemer claimants of Multi-Strat re potential approaches by Dondero and UBS and issues re same (.4); E-mails with J. Pomerantz re his comments/questions on same letter (.3); Further revise letter to such claimants, along with memo to Board re same (.2).	1.20	1145.00	\$1,374.00
12/23/2020	IDK	BL	E-mails with Board, J. Pomerantz re further correspondence with Dondero counsel on interference and Dondero requested discovery re plan	0.10	1145.00	\$114.50
12/23/2020	IDK	BL	Telephone conference with Dondero counsel and J. Pomerantz re further interference and next steps (.1); Review and consider draft of extensive letter to Dondero counsel re same and CLO instances and consequences, along with J Morris revisions of same (.2).	0.30	1145.00	\$343.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/23/2020	IDK	BL	Review and consider extensive letter from UBS on MS issues, and also re settlement offer on same (.2); E-mail to attorneys re same and need to revise letter to UBS/Clubock re same (.1); Review of further revised letter to UBS on interference and MS, and intent to take depositions of Dondero and Clubock (.1); E-mails to R Feinstein re need to revise letter to UBS to address new items on settlement history, delinking, and other items (.3); Review of further revised letter to UBS re same (.1); E-mails with R Feinstein re same, as well as his correspondence to Board (.1).	0.90	1145.00	\$1,030.50
12/23/2020	IDK	BL	Review of Dondero withdrawal of motion to clarify TRO and E-mail to J Morris re same (.1).	0.10	1145.00	\$114.50
12/23/2020	IDK	BL	E-mails with attorneys re draft of letter to NextPoint in response to its latest demands/threats yesterday re CLOs and asset sales, and issues of sanctions (.2); Review of new correspondence of today from NextPoint, others re their attempt to remove Debtor as manager of CLOs (.1); E-mails with attorneys re same and impact on next steps re NextPoint, and need for further revisions and sending to Board (.2).	0.50	1145.00	\$572.50
12/23/2020	IDK	BL	Review of further correspondence tonight with Dondero counsel on discovery and TRO issues (.1); Review briefly further revisions to letters to K&L Gates re NP and violations, and with Lynn (.2).	0.30	1145.00	\$343.50
12/23/2020	JNP	BL	Review and revise letter to Latham regarding Multi Strat and review drafts regarding same.	0.90	1075.00	\$967.50
12/23/2020	JNP	BL	Conference with Ira D. Kharasch regarding Multi Strat.	0.10	1075.00	\$107.50
12/23/2020	JNP	BL	Conference with John A. Morris regarding document preservation issues.	0.10	1075.00	\$107.50
12/23/2020	JNP	BL	Conference with PSZJ regarding letter to UBS regarding pending issue.	0.50	1075.00	\$537.50
12/23/2020	JNP	BL	Review letter to KL Gates regarding demand for sanctions.	0.10	1075.00	\$107.50
12/23/2020	JNP	BL	Review 2 versions of letter to M. Lynn regarding Dondero and emails regarding same.	0.20	1075.00	\$215.00
12/23/2020	JNP	BL	Conference with M. Lynn and Ira D. Kharasch regarding termination of Dondero access.	0.10	1075.00	\$107.50
12/23/2020	JNP	BL	Conference with J. Dubel regarding UBS issues.	0.20	1075.00	\$215.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/23/2020	JNP	BL	Conference with Robert J. Feinstein regarding letter to Latham regarding UBS.	0.10	1075.00	\$107.50
12/23/2020	JNP	BL	Review draft discovery.	0.10	1075.00	\$107.50
12/23/2020	JNP	BL	Conference with John A. Morris regarding discovery.	0.10	1075.00	\$107.50
12/23/2020	JNP	BL	Conference with Ira D. Kharasch regarding Latham latest letter regarding Multi Strat.	0.10	1075.00	\$107.50
12/23/2020	JNP	BL	Participate on Board call regarding UBS and other litigation issues.	1.20	1075.00	\$1,290.00
12/23/2020	JNP	BL	Conference with Robert J. Feinstein and Ira D. Kharasch regarding UBS issues and strategy.	0.30	1075.00	\$322.50
12/23/2020	JNP	BL	Conference with Robert J. Feinstein after Board call regarding UBS.	0.10	1075.00	\$107.50
12/23/2020	JNP	BL	Review letter to KL Gates and email regarding same.	0.10	1075.00	\$107.50
12/23/2020	RMP	BL	Conference with I. Kharasch re litigation issues.	0.20	1445.00	\$289.00
12/23/2020	JAM	BL	E-mail to M. Clemente, P. Montgomery, D. Draper, G. Demo re: UCC complaint against Dugaboy (0.1); e-mail to D. Draper, W. Horn re: UCC's suit against Dugaboy and related matters (0.1); telephone conference with G. Demo re: CLOs demand letter and related litigation matters (0.2); telephone conference with P. Montgomery re: confidentiality and work-product issues (0.4); e-mail to P. Montgomery, M. Clemente, C. Rognes re: confidentiality issues relating to the Appendix to the UCC's complaint against Dondero and others (0.1); telephone conference with J. Pomerantz, R. Feinstein, I. Kharasch, G. Demo re: litigation issues relating to Dondero, Clubok, and MultiSrat (0.5); review/revise deposition notices and document requests for Dondero and Clubok (0.6); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: discovery demands for Clubok and Dondero (0.1); telephone conference with J. Pomerantz, G. Demo, I. Kharasch, R. Feinstein re: UBS, Dondero issues (0.5); telephone conference with J. Pomerantz, I. Kharasch, G. Demo, B. Sharp, J. Seery re: document preservation and related matters (1.0); telephone conference with J. Pomerantz re: Dondero issues (0.1); review/revise HarbourVest Rule 9019 motion (0.2); further revisions to discovery demands for Dondero and Clubok (0.4); e-mails with J.	7.70	1075.00	\$8,277.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Pomerantz, I. Kharasch, G. Demo, H. Winograd, R. Feinstein re: discovery demands for Dondero and Clubok (0.2); review e-mails between G. Demo, Debevoise re: HarbourVest settlement, including revisions to agreement (0.5); review/revise letter to M. Lynn re: Dondero and TRO violations (0.5); telephone conference with Board, J. Pomerantz, I. Kharasch, R. Feinstein re: Dondero and Clubok issues and other litigation matters (0.2); e-mails w/ H. Winograd re: revisions to discovery demands for Dondero, Clubok (0.1); review draft letter to K&L Gates re: CLOs (0.3); e-mail to Board re: discovery demands for Dondero, Clubok (0.1); telephone conference with Board, J. Pomerantz, I. Kharasch, R. Feinstein re: Dondero and Clubok issues and other litigation matters (1.0); e-mail to J. Pomerantz, I. Kharasch, G. Demo draft letter to K&L Gates re: CLOs (0.1); telephone conference with J. Pomerantz, G. Demo re: letter to K&L Gates concerning CLO issues (0.4).			
12/23/2020	GVD	BL	Review letter from R. Feinstein re discovery issues	0.90	825.00	\$742.50
12/23/2020	GVD	BL	Conference with J. Morris re litigation strategy	0.20	825.00	\$165.00
12/23/2020	GVD	BL	Draft response letters to K&L Gates	1.20	825.00	\$990.00
12/23/2020	GVD	BL	Draft letter to M. Lynn re J. Dondero	1.20	825.00	\$990.00
12/23/2020	GVD	BL	Attend internal conference re potential litigation	0.50	825.00	\$412.50
12/23/2020	HRW	BL	Review and edit HarbourVest 9019 motion (1.5); Review letters to K&L Gates (0.6); Draft notice of hearing for HarbourVest 9019 motion (0.5); PSZJ call re: HarbourVest Settlement (0.3); PSZJ call with Debevoise re: HarbourVest Settlement (0.5); Review and edit document requests and depo notices (1.3).	4.10	625.00	\$2,562.50
12/24/2020	IDK	BL	E-mails with attorneys re status of various litigation items, need for call and agenda of items (.2); Attend conference call with attorneys re various litigation matters ongoing, including Dondero issues, UBS issues (.7); Review of J Morris extensive summary of numerous tasks re same (.1).	1.00	1145.00	\$1,145.00
12/24/2020	IDK	BL	Review of numerous E-mails with attorneys re deposition logistics on Clubok.	0.20	1145.00	\$229.00
12/24/2020	IDK	BL	Review of E-mails with CEO, others on further revised letters to K&L Gates on responses to their NextPoint letters re CLOs.	0.20	1145.00	\$229.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/24/2020	IDK	BL	E-mail to J Morris re revised complaint for injunction vs Dondero re plan, including brief review.	0.20	1145.00	\$229.00
12/24/2020	IDK	BL	E-mails with Dondero counsel re his feedback on our letters to and from NextPoint counsel on CLOs, interference, sales from same, and Dondero role.	0.20	1145.00	\$229.00
12/24/2020	JNP	BL	Email to team regarding litigation call and agenda.	0.10	1075.00	\$107.50
12/24/2020	JNP	BL	Review letters to KL Gates regarding CLOs.	0.10	1075.00	\$107.50
12/24/2020	JNP	BL	Conference with J. Dubel regarding outstanding litigation issue.	0.70	1075.00	\$752.50
12/24/2020	JNP	BL	Conference with PSZJ regarding discovery and litigation issues.	0.70	1075.00	\$752.50
12/24/2020	JNP	BL	Review and forward M Lynn email regarding discovery to the Board.	0.10	1075.00	\$107.50
12/24/2020	JNP	BL	Email to M. Lynn enclosing letters to K&L Gates and subsequent emails regarding same.	0.20	1075.00	\$215.00
12/24/2020	JNP	BL	Email to and from M. Lynn regarding discovery.	0.10	1075.00	\$107.50
12/24/2020	JAM	BL	Draft JAM Declaration in support of HarbourVest Rule 9019 motion (0.3); e-mail to G. Demo, H. Winograd re: JAM Declaration in support of HarbourVest Rule 9019 motion (0.1); review/revise letter to K&L Gates re: interference with Debtor's role as CLO portfolio manager (0.4); e-mail to G. Demo re: revisions to K&L Gates re: interference with Debtor's role as CLO portfolio manager (0.1); review/revise letter to K&L Gates re: threatened termination of Debtor as CLO portfolio manager (0.3); review e-mails between H. Winograd, Z. Annable re: HarbourVest filings (0.2); e-mail to G. Demo re: revisions to letter to K&L Gates re: threatened termination of Debtor as CLO portfolio manager (0.1); e-mails with J. Pomerantz, I. Kharasch, R. Feinstein, G. Demo, H. Winograd re: Clubok deposition (0.1); e-mails with H. Winograd, L. Canty, K. Klausner re: court reporter for Dondero and Clubok depositions (0.2); telephone conference with G. Demo re: status of letters to K&L Gates and related litigation issues (0.3); review proposed Order for HarbourVest Rule 9019 motion (0.1); e-mails with Z. Annabel re: filing of Dondero and Clubok deposition notices (0.1); telephone conference with J. Pomerantz, R. Feinstein, I. Kharasch, G. Demo, H. Winograd re: litigation workstreams (0.7); e-mail to	4.10	1075.00	\$4,407.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			J. Pomerantz, R. Feinstein, I. Kharasch, G. Demo, H. Winograd re: litigation workstreams (0.7); review e-mails between J. Pomerantz, M. Lynn re: document requests and CLO issues (0.2); telephone conference with H. Winograd re: litigation workstream issues (0.1); e-mail to J. Seery re: proposed amended Complaint against Dondero (0.1).			
12/24/2020	GVD	BL	Revise and circulate letters to K&L Gates re CLO issues	1.00	825.00	\$825.00
12/24/2020	GVD	BL	Conference with J. Morris re litigation strategy	0.30	825.00	\$247.50
12/24/2020	GVD	BL	Conference with PSZJ team re litigation strategy and next steps	0.70	825.00	\$577.50
12/24/2020	HRW	BL	Draft and prepare Proposed Order and Declaration for HarbourVest 9019 Motion (3.5); PSZJ Scheduling Call (0.6); Call with J. Morris re: TRO against Advisors, Funds, CLO Holdco (0.1).	4.20	625.00	\$2,625.00
12/25/2020	JAM	BL	Review documents and begin working on outline for Dondero deposition (3.4).	3.40	1075.00	\$3,655.00
12/26/2020	IDK	BL	E-mails with J Morris re IFA counsel request to attend depo and status of IFA.	0.20	1145.00	\$229.00
12/26/2020	JNP	BL	Conference with J. Dubel regarding UBS and related litigation matters (2x).	0.60	1075.00	\$645.00
12/26/2020	JNP	BL	Conference with Gregory V. Demo and Robert J. Feinstein regarding Multi Strat state court litigation.	0.20	1075.00	\$215.00
12/26/2020	JNP	BL	Conference with Gregory V. Demo regarding litigation matters.	0.20	1075.00	\$215.00
12/26/2020	JNP	BL	Emails regarding request to participate in J. Dondero deposition.	0.10	1075.00	\$107.50
12/26/2020	JAM	BL	Continued work on outline for Dondero deposition (2.2); e-mail to J. Pomerantz, I. Kharasch, R. Feinstein, G. Demo, H. Winograd re: Dondero deposition outline (0.1); review documents and draft statement of facts for TRO against K&L Gates' clients (1.1).	3.40	1075.00	\$3,655.00
12/26/2020	GVD	BL	Conference with R. Feinstein and J. Pomerantz re UBS litigation	0.20	825.00	\$165.00
12/26/2020	GVD	BL	Review issues re state court litigation for UBS claim	0.70	825.00	\$577.50
12/26/2020	HRW	BL	Draft Complaint and Memo of Law in support of TRO against Advisors, Funds, CLO Holdco (1.8).	1.80	625.00	\$1,125.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/27/2020	IDK	BL	Review of correspondence re draft of amended complaint vs Dondero for violation of TRO, as well as correspondence with Dondero counsel re discovery re TRO and Board.	0.30	1145.00	\$343.50
12/27/2020	JNP	BL	Review email from B. Assink regarding Dondero discovery and forward to Board.	0.10	1075.00	\$107.50
12/27/2020	JNP	BL	Review email from Gregory V. Demo regarding Multi Strat litigation and respond.	0.10	1075.00	\$107.50
12/27/2020	JAM	BL	Continued work on Seery Declaration in support of TRO (2.9); e-mail to G. Demo, H. Winograd re: draft Seery Declaration (0.1); e-mails to L. Canty, G. Demo, H. Winograd re: exhibits for Seery Declaration (0.2); e-mails with G. Demo re: various litigation issues (0.2); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: draft Seery Declaration (0.1); draft proposed temporary restraining order against the Advisors, Funds and CLO Holdco (0.4); e-mails with H. Winograd re: form of papers in support of TRO (0.1).	4.00	1075.00	\$4,300.00
12/27/2020	GVD	BL	Review docket entries in UBS matter and respond to same	0.30	825.00	\$247.50
12/27/2020	GVD	BL	Review and revise declaration in support of restraining order	1.10	825.00	\$907.50
12/27/2020	GVD	BL	Review and revise complaint re demand notes	0.50	825.00	\$412.50
12/27/2020	GVD	BL	Review outline re Dondero deposition	0.80	825.00	\$660.00
12/27/2020	GVD	BL	Review amended complaint re TRO	0.50	825.00	\$412.50
12/27/2020	HRW	BL	Draft Complaint and Memo of Law in support of TRO against Advisors, Funds, CLO Holdco (7.5).	7.50	625.00	\$4,687.50
12/28/2020	IDK	BL	E-mails with CEO, attorneys re today's e-mail exchanges with Dondero counsel re its objection to Dondero deposition later this week, including review of same, and next steps re pulling e-mails with Dondero (.2); Brief review of various e-mails produced by Dondero (.3).	0.50	1145.00	\$572.50
12/28/2020	IDK	BL	Numerous e-mails with attorneys re draft TRO, including brief review of same, re Dondero, as well as draft complaint vs NPA and HCMFA (.3); E-mails with attorneys re Dondero's just filed motion to quash discovery and potential responses, and potential draft response to same, including finalized version for filing today (.3); Review of	0.80	1145.00	\$916.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Court's chambers message on Dondero motion to quash (.1); E-mails with attorneys re our draft of order re same, as well as Dondero counsel comments/disputes to same (.1).			
12/28/2020	IDK	BL	Review of numerous e-mails with Board, others on MS and Reid Collins role and inquiries re same (.2); Review of correspondence from Reid Collins after call re same today and its reaction (.1); Telephone conference with J. Pomerantz re same (.1).	0.40	1145.00	\$458.00
12/28/2020	IDK	BL	E-mails with Board, others re NPA/Holdco extensive response letter to Debtor on allegations of breach of TRO and potential response and hearing (.2).	0.20	1145.00	\$229.00
12/28/2020	IDK	BL	Telephone conference with R. Pachulski and J. Pomerantz on various litigation issues with UBS, Clubbuck, Dondero.	0.40	1145.00	\$458.00
12/28/2020	JNP	BL	Review emails regarding Dondero discovery.	0.10	1075.00	\$107.50
12/28/2020	JNP	BL	Review Dondero motion for protective order.	0.10	1075.00	\$107.50
12/28/2020	JNP	BL	Review proposed TRO regarding CLO investors and advisors.	0.10	1075.00	\$107.50
12/28/2020	JNP	BL	Review J. Seery Declaration regarding TRO regarding CLO investors and advisors.	0.30	1075.00	\$322.50
12/28/2020	JNP	BL	Conference with John A. Morris regarding Dondero discovery motion and related issues.	0.20	1075.00	\$215.00
12/28/2020	JNP	BL	Conference with Robert J. Feinstein and John A. Morris regarding Dondero and UBS discovery.	0.30	1075.00	\$322.50
12/28/2020	JNP	BL	Conference with J. Dubel regarding Dondero discovery dispute and UBS (Several).	0.80	1075.00	\$860.00
12/28/2020	JNP	BL	Review opposition to discovery motion by Dondero.	0.10	1075.00	\$107.50
12/28/2020	JNP	BL	Conference with John A. Morris regarding opposition to discovery motion by Dondero.	0.10	1075.00	\$107.50
12/28/2020	JNP	BL	Review emails with Reid Collins regarding UBS and Multi Strat.	0.20	1075.00	\$215.00
12/28/2020	JNP	BL	Conference with John A. Morris and Gregory V. Demo regarding UBS Multi Strat litigation.	0.20	1075.00	\$215.00
12/28/2020	JNP	BL	Email regarding creditor participation in J. Dondero deposition.	0.10	1075.00	\$107.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/28/2020	JNP	BL	Conference with Reid Collins, John A. Morris and Gregory V. Demo regarding UBS Multi Strat litigation.	0.30	1075.00	\$322.50
12/28/2020	JNP	BL	Conference with J. Seery, Robert J. Feinstein, John A. Morris and Gregory V. Demo regarding UBS Multi Strat litigation.	0.70	1075.00	\$752.50
12/28/2020	JNP	BL	Conference with Richard M. Pachulski and Ira D. Kharasch regarding UBS and Multi Strat.	0.40	1075.00	\$430.00
12/28/2020	JNP	BL	Conference with Gregory V. Demo and John A. Morris regarding discovery from Dondero.	0.30	1075.00	\$322.50
12/28/2020	JNP	BL	Conference with Gregory V. Demo regarding J. Seery compensation proposal.	0.10	1075.00	\$107.50
12/28/2020	JNP	BL	Email to and from John A. Morris regarding Dondero edits to Order.	0.10	1075.00	\$107.50
12/28/2020	JNP	BL	Review internal emails regarding Preliminary Injunction.	0.20	1075.00	\$215.00
12/28/2020	RMP	BL	Conferences with J. Pomerantz and I. Kharasch re UBS and Dondero issues.	0.60	1445.00	\$867.00
12/28/2020	JMF	BL	Review Harborvest 9019 pleadings.	0.40	925.00	\$370.00
12/28/2020	JMF	BL	Review motion for protective order re discovery.	0.30	925.00	\$277.50
12/28/2020	JAM	BL	E-mail to B. Assink, M. Lynn, J. Bonds, J. Pomerantz, I. Kharasch, G. Demo re: Dondero's emergency motion for a protective order (0.4); review/revise Seery declaration in support of TRO (0.8); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: revised version of Seery Declaration in support of TRO (0.1); review/revise Complaint for declaratory and injunctive relief against Dondero-related entities (1.2); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: revised version of Complaint for declaratory and injunctive relief against Dondero-related entities (0.1); review/revise proposed Temporary Restraining Order against Dondero-related entities (0.8); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: revised version of Temporary Restraining Order against Dondero-related entities (0.1); e-mail to H. Winograd re: Complaint (0.1); e-mails to Z. Annable, G. Demo, H. Winograd, M. Hayward re: further filings (0.1); review Dondero emergency motion for a protective order (0.7); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H.	10.90	1075.00	\$11,717.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Winograd re: objection to Dondero emergency motion for protective order (0.7); draft objection to Dondero emergency motion for a protective order (2.2); telephone conference with G. Demo re: Dondero emails (0.1); e-mail to Board, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: draft objection to Dondero emergency motion for a protective order (0.1); revise draft objection to Dondero emergency motion for a protective order (0.1); telephone conference with J. Pomerantz, R. Feinstein re: Dondero motion for protective order and related matters (0.3); telephone conference with J. Pomerantz, G. Demo, W. Reid re: UBS litigation (0.3); telephone conference with J. Seery, J. Pomerantz, R. Feinstein, G. Demo re: UBS litigation and related matters (0.7); review communications from Court re: Dondero emergency motion for a protective order (0.1); telephone conference with J. Kathman re: Daugherty claim and litigation (0.1); draft Amended Notices of Deposition for Dondero and Clubok (0.2); draft proposed Order resolving Dondero motion for a protective order (0.7); e-mail to B. Assink, M. Lynn, J. Bond, J. Pomerantz, G. Demo re: proposed Order resolving Dondero motion for protective order (0.1); telephone conference with G. Demo re: document review (0.1); telephone conference with J. Pomerantz, G. Demo re: document review (0.3); review revised Complaint against Dondero-related entities (0.4).			
12/28/2020	GVD	BL	Review Dondero motions to quash discovery	0.20	825.00	\$165.00
12/28/2020	GVD	BL	Conference with Reid Collins, J. Pomerantz, and J. Morris	0.30	825.00	\$247.50
12/28/2020	GVD	BL	Conference re compiling discovery requests	0.30	825.00	\$247.50
12/28/2020	GVD	BL	Conference with J. Seery re discovery issues	0.20	825.00	\$165.00
12/28/2020	GVD	BL	Review multiple motions re potential Dondero litigation	1.30	825.00	\$1,072.50
12/28/2020	GVD	BL	Review discovery materials and correspondence re same	1.50	825.00	\$1,237.50
12/28/2020	GVD	BL	Conference with J. Dubel re correspondence with Reid Collins; revise and send same	0.70	825.00	\$577.50
12/28/2020	GVD	BL	Conference with J. Pomerantz, J. Morris, R. Feinstein, and J. Seery re open litigation issues and next steps	0.70	825.00	\$577.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/28/2020	HRW	BL	Draft and prepare Complaint, Memo of Law, and ancillary papers in support of TRO against Advisors, Funds, CLO Holdco (9.8).	9.80	625.00	\$6,125.00
12/29/2020	JNP	BL	Review and respond to draft email to A. Clubock.	0.10	1075.00	\$107.50
12/29/2020	JNP	BL	Conference with John A. Morris regarding discovery.	0.10	1075.00	\$107.50
12/29/2020	JNP	BL	Conference with J. Dubel regarding status of various litigation matters (4x).	0.70	1075.00	\$752.50
12/29/2020	JNP	BL	Conference with D. Draper, John A. Morris and Gregory V. Demo regarding claims.	0.30	1075.00	\$322.50
12/29/2020	JNP	BL	Conference with Ira D. Kharasch, John A. Morris, H.. Winograd, Gregory V. Demo and Robert J. Feinstein regarding various pending litigation matters including UBS, CLOs and Dondero.	1.00	1075.00	\$1,075.00
12/29/2020	JNP	BL	Review M. Sosland letter regarding discovery.	0.10	1075.00	\$107.50
12/29/2020	JNP	BL	Conference with John A. Morris regarding M. Sosland letter.	0.10	1075.00	\$107.50
12/29/2020	JNP	BL	Conference with Ira D. Kharasch regarding litigation issues.	0.10	1075.00	\$107.50
12/29/2020	JNP	BL	Meet and confer with M. Sosland, Latham, John A. Morris and Robert J. Feinstein regarding discovery.	0.80	1075.00	\$860.00
12/29/2020	JNP	BL	Email to and from M. Lynn regarding discovery.	0.10	1075.00	\$107.50
12/29/2020	JNP	BL	Conference with Robert J. Feinstein and John A. Morris after Latham Sosland meet and confer.	0.40	1075.00	\$430.00
12/29/2020	JNP	BL	Review email regarding summary of Multi Strat issues.	0.20	1075.00	\$215.00
12/29/2020	JNP	BL	Review email regarding response to Dondero letter regarding missing phone.	0.10	1075.00	\$107.50
12/29/2020	JNP	BL	Review emails regarding AT&T wireless account.	0.10	1075.00	\$107.50
12/29/2020	JMF	BL	Review motion and entered order re Dondero protective request.	0.20	925.00	\$185.00
12/29/2020	JMF	BL	Review committee complaint (.3) and seal order re court registry.	0.30	925.00	\$277.50
12/29/2020	JAM	BL	Review documents in connection with Dondero contempt motion (0.5); e-mail to the Board re: documents reviewed in connection with the Dondero	7.00	1075.00	\$7,525.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			contempt motion (0.8); draft e-mail to A. Clubok re: discovery (0.4); e-mails with J. Pomerantz, I. Kharasch, R. Feinstein, G. Demo re: A. Clubok discovery (0.2); revisions to e-mail to A. Clubok (0.1); e-mails with A. Clubok re: discovery (0.2); revise proposed Order resolving Dondero emergency motion for protective Order (0.1); e-mails with B. Assink, Z. Annable re: revised Order resolving Dondero emergency motion for protective Order (0.1); telephone conference with J. Pomerantz, I. Kharasch, R. Feinstein, G. Demo, H. Winograd re: various litigation issues (1.0); telephone conference with G. Demo re: privilege issues (0.1); telephone conference with J. Pomerantz re: Clubok response on discovery issues (0.1); e-mails with J. Seery, J. Kathman re: extension of deadline to serve discovery in Daugherty case (0.2); e-mails with B. Assink, M. Lynn, J. Pomerantz, G. Demo re: status of Dondero motions for TRO modifications and future estate transactions (0.2); telephone conference with J. Pomerantz, R. Feinstein, M. Sosland, A. Clubok re: meet and confer on discovery directed to Clubok (0.8); telephone conference with J. Pomerantz, R. Feinstein re: meet and confer on discovery directed to Clubok (0.4); revise document request for Andrew Clubok (0.2); draft e-mail to J. Pomerantz, R. Feinstein, M. Sosland, A. Clubok re: meet and confer on discovery directed to Clubok (0.4); telephone conference with J. Pomerantz re: draft e-mail concerning meet and confer on Clubok discovery (0.1); revise draft e-mail to J. Pomerantz, R. Feinstein, M. Sosland, A. Clubok re: meet and confer on discovery directed to Clubok (0.2); e-mail to J. Pomerantz, I. Kharasch, R. Feinstein, G. Demo, H. Winograd re: Dondero cell phone (0.4); e-mail to M. Lynn, B. Assink, J. Pomerantz, R. Feinstein, I. Kharasch, G. Demo, re: Dondero's cell phone (0.3); telephone conference with J. Seery re: Dondero/Clubok discovery issues (0.2).			
12/29/2020	EAW	BL	Review letter from A. Clubok re: claims against MultiStrat.	0.20	825.00	\$165.00
12/29/2020	GVD	BL	Review correspondence re email discovery	0.20	825.00	\$165.00
12/29/2020	GVD	BL	Conference with J. Morris re discovery issues	0.10	825.00	\$82.50
12/29/2020	GVD	BL	Review draft correspondence re deposition and discovery notices	0.30	825.00	\$247.50
12/29/2020	GVD	BL	Review presentation re historic trading	0.30	825.00	\$247.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/29/2020	GVD	BL	Conference with Draper firm re Dugaboy claims	0.30	825.00	\$247.50
12/29/2020	GVD	BL	Conference with PSZJ team re litigation issues (1.0); draft notes re same (0.2)	1.20	825.00	\$990.00
12/29/2020	GVD	BL	Conference with J. Morris re privilege issues	0.20	825.00	\$165.00
12/29/2020	GVD	BL	Multiple conferences with J. Seery re discovery issues	0.30	825.00	\$247.50
12/29/2020	GVD	BL	Correspondence with K&L Gates re litigation issues	0.20	825.00	\$165.00
12/29/2020	HRW	BL	Draft and edit TRO papers (1.5); Draft Document requests directed to Hunter Mountain (1.3); PSZJ call re: Discovery Issues (0.8); Review Clubok objections to document requests (0.2); Review Dondero objections to document production (0.2).	4.00	625.00	\$2,500.00
12/30/2020	JNP	BL	Review proposed email to clerk regarding discovery.	0.10	1075.00	\$107.50
12/30/2020	JNP	BL	Conference with Ira D. Kharasch and John A. Morris regarding Dondero phone and clerk email regarding discovery.	0.30	1075.00	\$322.50
12/30/2020	JNP	BL	Conference with J. Dubel regarding call with KL Gates and UBS matters.	0.20	1075.00	\$215.00
12/30/2020	JNP	BL	Conference with J. Kane, KL Gates, Gregory V. Demo and John A. Morris regarding CLO issues.	0.50	1075.00	\$537.50
12/30/2020	JNP	BL	Conference with Gregory V. Demo and John A. Morris after call with KL Gates.	0.30	1075.00	\$322.50
12/30/2020	JNP	BL	Conference with Ira D. Kharasch regarding call with KL Gates and UBS matters.	0.20	1075.00	\$215.00
12/30/2020	JNP	BL	Email to and from M. Lynn regarding request to allow Dondero one more day to clean out office.	0.10	1075.00	\$107.50
12/30/2020	JNP	BL	Conference with John A. Morris regarding discovery.	0.20	1075.00	\$215.00
12/30/2020	RMP	BL	Conferences with J. Pomerantz and I. Kharasch re various litigation and plan issues.	0.80	1445.00	\$1,156.00
12/30/2020	JMF	BL	Review amended complaint re CLO Holdco entities.	0.30	925.00	\$277.50
12/30/2020	JAM	BL	E-mail to J. Donohue, G. Demo re: AT&T contract (0.1); e-mails with R. Feinstein, H. Winograd re: AT&T and cell phone issues (0.1); draft e-mail to court re: Dondero document production and privilege issues (0.7); telephone conference with J. Pomerantz re: discovery issues (0.3); revise e-mail	3.00	1075.00	\$3,225.00

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			to court re: Dondero document production and privilege issues (0.1); telephone conference with J. Pomerantz, G. Demo, J. Kane, K&L Gates lawyers re: management and control of CLOs (0.5); telephone conference with J. Pomerantz, G. Demo re: follow-up to call with K&L Gates concerning management and control of CLOs (0.3); draft letter to M. Lynn re: Dondero's cell phones (0.4); draft e-mail to M. Sosland re: Clubok discovery issues (0.3); communications with J. Pomerantz re: draft e-mail to M. Sosland re: Clubok discovery issues (0.1); revise e-mail to M. Sosland re: Clubok discovery issues (0.1).			
12/30/2020	GVD	BL	Conference with counsel to employees re indemnification issues	0.30	825.00	\$247.50
12/30/2020	GVD	BL	Compile and email transcripts to counsel to employees	0.30	825.00	\$247.50
12/30/2020	GVD	BL	Review discovery issues	0.70	825.00	\$577.50
12/30/2020	GVD	BL	Conference with counsel to NPA/HCMFA/DAF re CLO issues and follow up re same	0.80	825.00	\$660.00
12/30/2020	GVD	BL	Conference with J. Seery re discovery issues	0.20	825.00	\$165.00
12/30/2020	GVD	BL	Correspondence with M. Lynn re discovery issues	0.30	825.00	\$247.50
12/30/2020	GVD	BL	Conference with J. Morris re discovery issues	0.20	825.00	\$165.00
12/30/2020	HRW	BL	Draft document requests directed to Hunter Mountain and HCRE (3.9); Call AT&T to retrieve HCMLP phone records (0.3); Call with K&L Gates re: Discussion of open issues (0.5).	4.70	625.00	\$2,937.50
12/31/2020	JNP	BL	Conference with Gregory V. Demo regarding discovery and related issues.	0.20	1075.00	\$215.00
12/31/2020	JNP	BL	Conference with John A. Morris regarding discovery.	0.10	1075.00	\$107.50
12/31/2020	JNP	BL	Review discovery provided by J. Dondero.	0.20	1075.00	\$215.00
12/31/2020	JNP	BL	Conference with J. Dubel regarding UBS status and related matters.	0.70	1075.00	\$752.50
12/31/2020	JNP	BL	Conference with Ira D. Kharasch regarding call with J. Dubel regarding UBS.	0.20	1075.00	\$215.00
12/31/2020	JAM	BL	Review documents/e-mails in connection with Preliminary Injunction motion (0.9); e-mail to J. Pomerantz, I. Kharasch, G. Demo, H. Winograd, L.	3.50	1075.00	\$3,762.50

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			Canty re: document review (0.3); communications with Court, B. Assink, M. Lynn, J. Pomerantz, G. Demo re: Dondero document production (0.1); review documents produced by Dondero (0.8); review/revise document requests for Hunter Mountain (0.4); e-mail to J. Pomerantz, I. Kharasch, G. Demo, J. Seery, H. Winograd re: document requests for Hunter Mountain (0.1) review/revise document requests for HCREP (0.3); e-mail to J. Pomerantz, I. Kharasch, G. Demo, J. Seery, H. Winograd re: document requests for HCREP (0.1); telephone conference with J. Seery re: litigation issues (0.2); telephone conference with J. Pomerantz re: Dondero discovery issues (0.1); e-mail to G. Demo, H. Winograd, L. Drawhorn re: document requests for HCREP (0.1); e-mail to G. Demo, H. Winograd, P. Keiffer re: document requests for Hunter Mountain (0.1).			
12/31/2020	GVD	BL	Review discovery materials	4.30	825.00	\$3,547.50
12/31/2020	GVD	BL	Review letters from K&L Gates re Dondero issues	0.30	825.00	\$247.50
12/31/2020	HRW	BL	Review document requests directed to Hunter Mountain and HCRE (0.6).	0.60	625.00	\$375.00
				562.10		\$526,686.00

Case Administration [B110]

12/01/2020	IDK	CA	Review of updated WIP list (.1); Attend conference call with internal team on WIP list and major open issues (1.0); Attend conference call with DSI on its WIP list (.5).	1.60	1145.00	\$1,832.00
12/01/2020	JNP	CA	Weekly PSZJ WIP call.	1.00	1075.00	\$1,075.00
12/01/2020	JNP	CA	Weekly PSZJ and DSI WIP call.	0.50	1075.00	\$537.50
12/01/2020	JEO	CA	Call with PSZJ team to review open issues	1.00	925.00	\$925.00
12/01/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
12/01/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (1.4)	1.60	350.00	\$560.00
12/01/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (1.7) enter documents into legal key (.5)	2.40	350.00	\$840.00
12/01/2020	JMF	CA	Draft memorandum re updated case and litigation issues (.5); telephone call with J.N. Pomerantz, I.	2.00	925.00	\$1,850.00

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			Kharasch, G. Demo, J. O'Neill and J. Morris re same (1.0); telephone call with I. Kharasch, B. Sharp, G. Demo, J. Morris re pending case issues (.5).			
12/01/2020	JMF	CA	Review critical dates memorandum.	0.20	925.00	\$185.00
12/01/2020	KSN	CA	Maintain document control.	0.20	350.00	\$70.00
12/01/2020	JAM	CA	Internal WIP call (J. Pomerantz, I. Kharasch, G. Demo, J. Fried, J. O'Neill) (1.0).	1.00	1075.00	\$1,075.00
12/01/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/01/2020	GVD	CA	prepare for WIP call (0.1); attend WIP call (1.0); attend DSI/PSZJ WIP Call (0.5); correspondence with Latham re plan revisions (0.1); daily status call with J. Romey (0.4); conference with J. Seery re open items and next steps (0.4); conference with E. Bromagen re open issues (0.2)	2.70	825.00	\$2,227.50
12/02/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
12/02/2020	KSN	CA	Maintain document control.	0.10	350.00	\$35.00
12/02/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/02/2020	GVD	CA	Conference with J. Pomerantz, I. Kharasch, and J. Morris re open issues and next steps (0.8); daily status conference with J. Romey re open issues (0.2); conference with J. Seery re open issues (0.2); conference with I. Kharasch re scheduling items (0.2)	1.40	825.00	\$1,155.00
12/03/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
12/03/2020	KSN	CA	Maintain document control.	0.20	350.00	\$70.00
12/03/2020	JAM	CA	Telephone conference with G. Demo re: letters, concerning demand notes, HarbourVest, Daugherty and related matters (0.3); telephone conference with J. Pomerantz re: Dondero threats (0.1).	0.40	1075.00	\$430.00
12/03/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/03/2020	GVD	CA	Multiple conferences with J. Seery re open issues and next steps (0.6); daily conference with J. Romey re open issues and next steps (0.3)	0.90	825.00	\$742.50
12/04/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/04/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (1.4)	1.60	350.00	\$560.00
12/04/2020	JMF	CA	Draft memo re pending case issues.	0.40	925.00	\$370.00
12/04/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/04/2020	GVD	CA	Review open issues and next steps	0.30	825.00	\$247.50
12/05/2020	GVD	CA	Correspondence with Acis re outstanding invoices	0.20	825.00	\$165.00
12/07/2020	KSN	CA	Maintain document control.	0.20	350.00	\$70.00
12/07/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/07/2020	GVD	CA	Daily status call with J. Romey (0.2); conference with E. Bromagen re open items and next steps (0.3)	0.50	825.00	\$412.50
12/08/2020	IDK	CA	E-mails with attorneys re upcoming WIP call and potential need to reschedule, as well as new hearing dates on new litigation and HarbourVest.	0.20	1145.00	\$229.00
12/08/2020	KKY	CA	Review and revise critical dates	3.20	425.00	\$1,360.00
12/08/2020	SLP	CA	Maintain document control.	0.50	350.00	\$175.00
12/08/2020	JMF	CA	Draft memorandum re updated case issues and pending matters.	0.50	925.00	\$462.50
12/08/2020	GVD	CA	Daily status conference with J. Romey	0.30	825.00	\$247.50
12/08/2020	GVD	CA	Conference with J. Seery re open items and next steps	0.70	825.00	\$577.50
12/09/2020	IDK	CA	Review of updated WIP list, and J Fried comments on recent changes to same (.2); Attend internal WIP call for all open issues in case (.5); Attend DSI WIP call on its related issues, including transition of management services, including shared services, other related contracts (.6).	1.30	1145.00	\$1,488.50
12/09/2020	JNP	CA	Participate (partial) on PSZJ WIP call.	0.30	1075.00	\$322.50
12/09/2020	JNP	CA	PSZJ DSI WIP call.	0.60	1075.00	\$645.00
12/09/2020	JNP	CA	Conference with Gregory V. Demo after DSI PSZJ WIP call.	0.10	1075.00	\$107.50
12/09/2020	KKY	CA	Review and revise critical dates	0.50	425.00	\$212.50
12/09/2020	JEO	CA	Participate in PSZJ team call re pending matters.	0.40	925.00	\$370.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/09/2020	JMF	CA	Telephone call with G. Demo, J. Morris, I. Kharasch, J. O'Neill, J.N. Pomerantz re pending case matters (.5); review docket and update summary memo re same (.5); telephone call with F. Caruso, B. Sharp, J.N. Pomerantz, G. Demo, J. Romey re status of pending case issues (.5).	1.50	925.00	\$1,387.50
12/09/2020	KSN	CA	Maintain document control.	0.20	350.00	\$70.00
12/09/2020	JAM	CA	Internal WIP call (J. Pomerantz, I. Kharasch, G. Demo, J. Fried) (0.5).	0.50	1075.00	\$537.50
12/09/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.30	350.00	\$105.00
12/09/2020	GVD	CA	Attend WIP call	0.50	825.00	\$412.50
12/09/2020	GVD	CA	Attend PSZJ/DSI WIP Call	0.60	825.00	\$495.00
12/09/2020	GVD	CA	Conference with I. Kharasch re allocation of research questions	0.10	825.00	\$82.50
12/10/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
12/10/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (1.3	1.50	350.00	\$525.00
12/10/2020	JMF	CA	Update memorandum re pending case issues and litigation.	0.30	925.00	\$277.50
12/10/2020	KSN	CA	Maintain document control.	0.20	350.00	\$70.00
12/10/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/11/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (7.) enter documents into legal key (.3)	1.20	350.00	\$420.00
12/11/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
12/11/2020	JMF	CA	Update memorandum re pending litigation and case issues.	0.30	925.00	\$277.50
12/11/2020	KSN	CA	Maintain document control.	0.20	350.00	\$70.00
12/11/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/11/2020	GVD	CA	Review motion re extension of removal deadline	0.20	825.00	\$165.00
12/11/2020	GVD	CA	Daily status conference with J. Romey re open items and next steps	0.10	825.00	\$82.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/11/2020	GVD	CA	Conference with J. Seery re open items and next steps	0.40	825.00	\$330.00
12/11/2020	GVD	CA	Conference with J. Pomerantz re open items and status of case	0.20	825.00	\$165.00
12/13/2020	GVD	CA	Status conference with J. Seery re open items and next steps	0.20	825.00	\$165.00
12/14/2020	KKY	CA	Review and revise critical dates	0.30	425.00	\$127.50
12/14/2020	SLP	CA	Maintain document control.	0.60	350.00	\$210.00
12/14/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (2.7)	2.90	350.00	\$1,015.00
12/14/2020	JMF	CA	Draft summary of pending motions and litigation matters.	0.30	925.00	\$277.50
12/14/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/14/2020	GVD	CA	Conference with J. Seery re open items and next steps	0.20	825.00	\$165.00
12/14/2020	GVD	CA	Conference with J. Romey re open items and next steps	0.20	825.00	\$165.00
12/15/2020	IDK	CA	E-mails with J Fried and J O'Neill re updated WIP list, and questions on same, including review of same (.2); E-mails and telephone conference with J. Pomerantz re upcoming WIP calls and need to delay (.2); E-mails with attorneys re same for rescheduling (.1); Attend WIP call on open issues, next steps in case (.6); Attend DSI related WIP call on their open items (.4).	1.50	1145.00	\$1,717.50
12/15/2020	JNP	CA	Conference with PSZJ team regarding WIP call.	0.60	1075.00	\$645.00
12/15/2020	JEO	CA	Participate in PSZJ team call to review open issues	0.60	925.00	\$555.00
12/15/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (1.7)	1.90	350.00	\$665.00
12/15/2020	KSN	CA	Maintain document control.	0.20	350.00	\$70.00
12/15/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.20	350.00	\$70.00
12/15/2020	GVD	CA	Attend DSI/PSZJ WIP Call	0.40	825.00	\$330.00
12/15/2020	GVD	CA	Attend WIP call	0.40	825.00	\$330.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/15/2020	HRW	CA	PSZJ WIP call	0.60	625.00	\$375.00
12/16/2020	GVD	CA	Conference with J. Seery re open items and next steps	0.60	825.00	\$495.00
12/17/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
12/17/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (2.7)	2.90	350.00	\$1,015.00
12/17/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	1.40	350.00	\$490.00
12/17/2020	GVD	CA	Conference with J. Pomerantz re scheduling issues	0.20	825.00	\$165.00
12/17/2020	GVD	CA	Attend to issues re scheduling	0.20	825.00	\$165.00
12/17/2020	GVD	CA	Multiple conferences with J. Seery re open issues and next steps	0.80	825.00	\$660.00
12/17/2020	GVD	CA	Conference with J. Pomerantz re status of discussions with J. Seery	0.20	825.00	\$165.00
12/18/2020	KKY	CA	Review and revise critical dates	2.40	425.00	\$1,020.00
12/18/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
12/18/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (1.8)	2.00	350.00	\$700.00
12/18/2020	JMF	CA	Review docket and draft update re case issues and motions brief.	0.40	925.00	\$370.00
12/18/2020	KSN	CA	Maintain document control.	0.20	350.00	\$70.00
12/18/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/18/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.30	350.00	\$105.00
12/18/2020	GVD	CA	Conference with J. Seery re open items and next steps	0.30	825.00	\$247.50
12/20/2020	GVD	CA	Correspondence re scheduling meetings with creditors	0.20	825.00	\$165.00
12/21/2020	KKY	CA	Review and revise critical dates	3.00	425.00	\$1,275.00
12/21/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (8.)	1.00	350.00	\$350.00
12/21/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (1.7)	1.90	350.00	\$665.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/21/2020	SLP	CA	Maintain document control.	3.10	350.00	\$1,085.00
12/21/2020	KSN	CA	Maintain document control.	0.30	350.00	\$105.00
12/21/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.50	350.00	\$175.00
12/21/2020	GVD	CA	Daily status conference with J. Romey re open items and next steps	0.40	825.00	\$330.00
12/21/2020	GVD	CA	Status conference with J. Seery re open items and next steps	0.50	825.00	\$412.50
12/21/2020	GVD	CA	Attend to open issues re case administration	0.30	825.00	\$247.50
12/22/2020	IDK	CA	Review of updated WIP list (.1) ; Attend internal WIP call on open issues (.4).	0.50	1145.00	\$572.50
12/22/2020	JNP	CA	Participate on PSZJ WIP call.	0.40	1075.00	\$430.00
12/22/2020	KKY	CA	Review and revise critical dates	1.00	425.00	\$425.00
12/22/2020	JEO	CA	Attend WIP call	0.40	925.00	\$370.00
12/22/2020	SLP	CA	Maintain document control.	0.40	350.00	\$140.00
12/22/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (3.7)	3.90	350.00	\$1,365.00
12/22/2020	JMF	CA	Draft updated memorandum re pending case issues (.4); telephone call with J.N. Pomerantz, I. Kharasch, G. Demo, J. O'Neill re same (.4).	0.80	925.00	\$740.00
12/22/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/22/2020	GVD	CA	Attend WIP call	0.40	825.00	\$330.00
12/22/2020	GVD	CA	Daily status conference with J. Romey re open items and next steps	0.20	825.00	\$165.00
12/22/2020	GVD	CA	Multiple calls with J. Seery re open items and next steps	0.80	825.00	\$660.00
12/22/2020	GVD	CA	Conference with J. Pomerantz re open issues	0.10	825.00	\$82.50
12/22/2020	HRW	CA	Draft depo notices and document requests for Dondero injunctive relief hearing (3.2); Review and edit HarbourVest 9019 motion (1.5); PSZJ WIP Call (0.4).	5.10	625.00	\$3,187.50
12/23/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/23/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (2.4)	3.90	350.00	\$1,365.00
12/23/2020	JMF	CA	Draft updated memorandum re pending case issues.	0.30	925.00	\$277.50
12/23/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/23/2020	GVD	CA	Review issues re privilege	0.10	825.00	\$82.50
12/24/2020	GVD	CA	Multiple conferences with J. Seery re open issues and next steps	0.50	825.00	\$412.50
12/24/2020	GVD	CA	Conference with M. Maloney re settlement issues	0.30	825.00	\$247.50
12/28/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
12/28/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (2.8)	3.00	350.00	\$1,050.00
12/28/2020	GVD	CA	Daily status conference with J. Romey re open items and next steps	0.30	825.00	\$247.50
12/28/2020	GVD	CA	Conference with J. Seery re open issues and next steps	0.50	825.00	\$412.50
12/29/2020	JNP	CA	Participate in weekly WIP call with PSZJ.	0.80	1075.00	\$860.00
12/29/2020	JNP	CA	Participate in weekly WIP call with PSZJ and DSI.	0.40	1075.00	\$430.00
12/29/2020	JEO	CA	Call with PSZJ team to review open issues	0.80	925.00	\$740.00
12/29/2020	SLP	CA	Maintain document control.	0.80	350.00	\$280.00
12/29/2020	SLP	CA	Maintain document control (2) receive multiple documents to organize (2.6) enter documents into legal key (.5)	3.30	350.00	\$1,155.00
12/29/2020	JMF	CA	Draft memorandum of litigation and pending issues (.4); telephone call with J.N. Pomerantz, G. Demo, J. Morris, I. Kharasch, J. O'Neill re same (.6); review DSI plan tracking list (.2) and telephone call with J.N. Pomerantz, F. Caruso, G. Demo and I. Kharasch re same (.4).	1.60	925.00	\$1,480.00
12/29/2020	JAM	CA	Internal WIP call (with J. Pomerantz, I. Kharasch, G. Demo, J. Fried, J. O'Neill) (0.8).	0.80	1075.00	\$860.00
12/29/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/29/2020	GVD	CA	Daily status call with J. Romey re open items and next steps	0.30	825.00	\$247.50

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				Hours	Rate	Amount
12/29/2020	GVD	CA	Attend WIP call	0.80	825.00	\$660.00
12/29/2020	GVD	CA	Attend DSI/PSZJ WIP Call	0.40	825.00	\$330.00
12/29/2020	HRW	CA	PSZJ WIP Call (0.8).	0.80	625.00	\$500.00
12/30/2020	JNP	CA	Review notice of counsel substitution for employees and respond regarding same.	0.10	1075.00	\$107.50
12/30/2020	KKY	CA	Review and revise 2002 service list	0.50	425.00	\$212.50
12/30/2020	KKY	CA	Review and revise critical dates	2.10	425.00	\$892.50
12/30/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
12/30/2020	BMK	CA	Prepared daily memo narrative and coordinated client distribution.	0.10	350.00	\$35.00
12/30/2020	GVD	CA	Status conference with J. Seery re open items	0.60	825.00	\$495.00
12/30/2020	GVD	CA	Daily status conference with J. Romey re open items and next steps	0.20	825.00	\$165.00
12/31/2020	SLP	CA	Maintain document control.	0.20	350.00	\$70.00
				112.40		\$67,737.00

Claims Admin/Objections[B310]

11/12/2020	LSC	CO	Preparation for Daugherty hearing, including preparation of additional exhibits.	2.70	425.00	\$1,147.50
11/13/2020	LSC	CO	Preparation of exhibit list and exhibits (including redaction of same) for J. Morris in connection with hearing on Daugherty 3018 motion.	2.90	425.00	\$1,232.50
11/17/2020	LSC	CO	Prepare for and assist at hearing on Daugherty 3018 motion.	3.90	425.00	\$1,657.50
11/18/2020	RJF	CO	Prepare for summary judgment motion.	2.00	1245.00	\$2,490.00
11/18/2020	RJF	CO	Telephone conference with Elissa regarding summary judgment motion.	0.40	1245.00	\$498.00
11/18/2020	RJF	CO	Telephone conference with Seery and Elissa regarding summary judgment motion.	0.80	1245.00	\$996.00
11/19/2020	RJF	CO	Telephone conference with Seery regarding oral argument.	0.30	1245.00	\$373.50
11/19/2020	RJF	CO	Prepare for argument, including review of all motion papers, outline preparation.	5.00	1245.00	\$6,225.00

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11/19/2020	RJF	CO	Call with UBS, Redeemer counsel regarding evidentiary issues.	0.50	1245.00	\$622.50
11/25/2020	RJF	CO	Review and revise summary judgment order, related emails.	0.40	1245.00	\$498.00
11/30/2020	RJF	CO	Emails regarding summary judgment order.	0.20	1245.00	\$249.00
12/01/2020	IDK	CO	Various E-mails with IFA counsel re status on their claim and their bankruptcy case and timing (.3).	0.30	1145.00	\$343.50
12/01/2020	JEO	CO	Follow up on open claim issues	0.80	925.00	\$740.00
12/01/2020	JMF	CO	Review IFA stipulation and issues re disallowance of claim.	0.40	925.00	\$370.00
12/01/2020	EAW	CO	Revise and circulate order on summary judgment motions; and emails to/from R. Feinstein, T. Mascherin and S. Tomkowiak re: same.	1.20	825.00	\$990.00
12/01/2020	GVD	CO	Attend call re CLO issuer claims (0.4); conference with J. Romey re same (0.2)	0.60	825.00	\$495.00
12/02/2020	IDK	CO	E-mails with attorneys re status on call with HarbourVest on negotiations, including re CEO's proposed settlement offer re same, including review of same (.2); Telephone conference with G Demo re same (.1).	0.30	1145.00	\$343.50
12/02/2020	IDK	CO	E-mails with J O'Neill re status on IFA claim and timing of renewing objection.	0.20	1145.00	\$229.00
12/02/2020	IDK	CO	E-mails with G Demo and J. Pomerantz re correspondence from Dondero counsel on withdrawal of claims, questions on prejudice and bar date re same.	0.30	1145.00	\$343.50
12/02/2020	JNP	CO	Conference with John A. Morris regarding Harbourvest and Daugherty.	0.20	1075.00	\$215.00
12/02/2020	JNP	CO	Conference with Harbourvest, Debevoise, J. Seery and John A. Morris regarding potential settlement.	0.90	1075.00	\$967.50
12/02/2020	JNP	CO	Review UBS proposed 3018 Order.	0.10	1075.00	\$107.50
12/02/2020	JNP	CO	Conference with Ira D. Kharasch and John A. Morris regarding claims and related issues.	0.30	1075.00	\$322.50
12/02/2020	JMF	CO	Review 2nd omnibus claims objection.	0.30	925.00	\$277.50
12/02/2020	JAM	CO	Telephone conference with J. Kathman re: status and potential settlement of Daugherty claim (0.3); telephone conference with J. Seery re: HarbourVest	2.10	1075.00	\$2,257.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			settlement call (0.2); telephone conference with J. Pomerantz re: HarbourVest and Daugherty settlement issues (0.2); telephone conference with J. Seery, J. Pomerantz, G. Demo, Harbourvest, and HarbourVest's counsel re: settlement (0.8); telephone conference with J. Seery re: HarbourVest and Daugherty settlement issues (0.2); telephone conference with J. Pomerantz, I. Kharasch, re: HarbourVest and Daugherty settlement issues (0.4).			
12/02/2020	GVD	CO	Review DSI presentation on claims issues (0.4); conference with HarbourVest re potential claims resolution (0.8); conference with CLO issuers re potential resolution (0.8); conference with J. Romey re CLO issues (0.2); conference with J. Donohue re claims presentation (0.3)	2.50	825.00	\$2,062.50
12/03/2020	IDK	CO	Review briefly numerous E-mails to and correspondence with attorneys, Redeemer, local counsel re problems with UBS proposed order on 3018 and summary judgment motion and next steps on meet and confer and going to court.	0.30	1145.00	\$343.50
12/03/2020	IDK	CO	E-mails to G Demo, J. Pomerantz re Acis objection to Hunton claim and repercussions in our estate re same, and next steps to resolve.	0.20	1145.00	\$229.00
12/03/2020	IDK	CO	E-mails to J Morris, CEO re Daugherty new settlement offer of today and issues re same and consider.	0.20	1145.00	\$229.00
12/03/2020	IDK	CO	E-mail to J Morris re feedback from HarbourVest on settlement discussions and related information.	0.20	1145.00	\$229.00
12/03/2020	JNP	CO	Review and respond to Gregory V. Demo email regarding Hunton claim.	0.10	1075.00	\$107.50
12/03/2020	KKY	CO	Respond (.1) to email from James E. O'Neill re 2nd omnibus claims objection; and review (.2) docket re same	0.30	425.00	\$127.50
12/03/2020	RJF	CO	Initial review of UBS markup of summary judgment order.	0.30	1245.00	\$373.50
12/03/2020	JMF	CO	Review Dondero stipulation re claims withdrawal.	0.20	925.00	\$185.00
12/03/2020	JMF	CO	Analyze issues re Dugaboy claims amendments and administrative claim assertion.	0.50	925.00	\$462.50
12/03/2020	JMF	CO	Review pleadings re 3018 amounts re ballots and plan voting issues.	0.60	925.00	\$555.00
12/03/2020	JAM	CO	Telephone conference with D. Stroik re:	0.50	1075.00	\$537.50

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			HarbourVest status, settlement (0.3); e-mail to J. Seery, J. Pomerantz, I. Kharasch, G. Demo re: HarbourVest settlement issues (0.2).			
12/03/2020	EAW	CO	Review draft order on 3018 motion; and emails to/from PSZJ team, counsel for Redeemer Committee, and counsel for UBS re: same.	0.20	825.00	\$165.00
12/03/2020	EAW	CO	Review UBS's edits to order on summary judgment motions.	0.20	825.00	\$165.00
12/03/2020	EAW	CO	Emails to/from PSZJ team, T. Mascherin, Z. Annable and UBS's counsel re: order on summary judgment motions.	0.20	825.00	\$165.00
12/03/2020	GVD	CO	Conference with J. Rovira re Hunton/Acis issues (0.4); draft follow up email re Hunton/Acis issues (0.2); conference with I. Kharasch re employee claims (0.1)	0.70	825.00	\$577.50
12/04/2020	IDK	CO	E-mails and telephone conferences with J Fried on claims threatened by key employees and need for analysis (.3); E-mails to K Dine re same (.1); E-mail to J Fried, DSI re same and coordination of call next week (.1).	0.50	1145.00	\$572.50
12/04/2020	IDK	CO	Review of numerous correspondence with internal team on UBS meet and confer re disputes over order.	0.10	1145.00	\$114.50
12/04/2020	IDK	CO	E-mails to J Morris, CEO on HarbourVest correspondence and court's options on continued hearing date for 3018 motion (.2).	0.20	1145.00	\$229.00
12/04/2020	JNP	CO	Email to James E. O'Neill regarding tracking of claims transfers.	0.10	1075.00	\$107.50
12/04/2020	PJJ	CO	Research employee claims, download and circulate to Joshua M. Fried.	0.80	425.00	\$340.00
12/04/2020	JEO	CO	Review status of claims	0.80	925.00	\$740.00
12/04/2020	RJF	CO	Review UBS markup of summary judgment order and related emails.	0.80	1245.00	\$996.00
12/04/2020	RJF	CO	Meet and confer call with UBS regarding summary judgment order.	0.50	1245.00	\$622.50
12/04/2020	RJF	CO	Review revised order for submission, related emails and UBS submission.	0.80	1245.00	\$996.00
12/04/2020	JAM	CO	E-mail to J. Seery, J. Pomerantz, I. Kharasch, G. Demo re: HarborVest status (0.1); communications	0.40	1075.00	\$430.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			with D. Stroik re: status of HarbourVest Rule 3018 motion (0.1); telephone conference with J. Seery re: settlement negotiations with HarbourVest (0.2).			
12/04/2020	EAW	CO	Telephone call with PSZJ team, T. Mascherin, M. Hankin, and counsel for UBS re: draft summary judgment order.	0.60	825.00	\$495.00
12/04/2020	EAW	CO	Review transcript of hearing on summary judgment motions.	0.20	825.00	\$165.00
12/04/2020	EAW	CO	Review redlined order submitted by UBS.	0.10	825.00	\$82.50
12/04/2020	EAW	CO	Review comments from R. Feinstein and T. Mascherin on draft summary judgment order; revise order; and coordinate with Z. Annable to submit order.	1.20	825.00	\$990.00
12/04/2020	EAW	CO	Emails to/from PSZJ team, T. Mascherin, Z. Annable and UBS's counsel re: order on summary judgment motions.	0.30	825.00	\$247.50
12/04/2020	GVD	CO	Correspondence with B. Assink re Dugaboy claims (0.1); prepare for meeting with CLO issuers re claim (0.1); conference with CLO Issuers re claim resolution (0.5); conference with J. Seery re CLO issuers claim resolution (0.5); draft term sheet re resolution of CLO issuer claims (0.9); conference with J. Rovira re Hunton claim (0.2); conference with A. Chiarello re Hunton claim (0.6); attend to follow up issues re CLO proof of claim (0.3); conference with J. Wright re CLO issues (0.6); conference with Dechert re CLO issues (0.5); attend to follow up items re conference with Dechert (0.2)	4.50	825.00	\$3,712.50
12/05/2020	GVD	CO	Conference with Dechert re CLO issues (0.6); attend to follow up matters re CLO issues (0.5)	1.10	825.00	\$907.50
12/06/2020	JAM	CO	Telephone conference with H. Winograd re: status of HarbourVest claim objection/settlement (0.2).	0.20	1075.00	\$215.00
12/07/2020	IDK	CO	Review briefly correspondence with chambers and local counsel re continuance of HarbourVest 3018, and calendar.	0.20	1145.00	\$229.00
12/07/2020	KKY	CO	Prepare order re 2nd omnibus objection to claims	0.30	425.00	\$127.50
12/07/2020	RJF	CO	Emails regarding summary judgment order.	0.10	1245.00	\$124.50
12/07/2020	EAW	CO	Review emails from Court, Z. Annable and PSZJ team re: proposed summary judgment order.	0.10	825.00	\$82.50
12/07/2020	GVD	CO	Conference with J. Bain re CLO issuer claims (0.1);	0.60	825.00	\$495.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			conference with J. Rovira re Hunton claim (0.5)			
12/08/2020	IDK	CO	E-mails with CEO, J Morris re his summary of settlement offers to Daugherty re adversary and objection to claim, including later response of Daugherty to same and next steps.	0.20	1145.00	\$229.00
12/08/2020	IDK	CO	Review of various E-mails with client group and attorneys re UBS discovery and cash bridge (.1); E-mails with CEO, others re Redeemer E-mail to requesting consent to intervene in UBS appeal, including our consent to same (.2).	0.30	1145.00	\$343.50
12/08/2020	JNP	CO	Review emails regarding Harbourvest settlement discussions.	0.10	1075.00	\$107.50
12/08/2020	JEO	CO	Work on revised order and exhibit for 2nd omnibus claim objection	0.60	925.00	\$555.00
12/08/2020	JAM	CO	Telephone conference with J. Seery re: HarbourVest settlement issues (0.4); e-mails with J. Kathman, J. Seery re: Daugherty settlement issues (0.2).	0.60	1075.00	\$645.00
12/08/2020	EAW	CO	Emails to/from Z. Annable, T. Mascherin, M. Hankin and PSZJ team re: summary judgment order.	0.10	825.00	\$82.50
12/08/2020	EAW	CO	Review proposed revisions to summary judgment order; and revise and circulate summary judgment order.	0.80	825.00	\$660.00
12/08/2020	GIG	CO	Emails with Gregory V. Demo re Dondero proofs of claim, note agreements	0.20	895.00	\$179.00
12/08/2020	GIG	CO	Review proofs of claim, note agreements	0.40	895.00	\$358.00
12/08/2020	GVD	CO	Correspondence with G. Glazer re related entity proofs of claim	0.30	825.00	\$247.50
12/09/2020	IDK	CO	E-mails with attorneys re HarbourVest correspondence re NDA/protective order.	0.10	1145.00	\$114.50
12/09/2020	JNP	CO	Email to and from KCC regarding list of transferred claims.	0.10	1075.00	\$107.50
12/09/2020	KKY	CO	Draft certification of no objection re 2nd omnibus objection to claims	0.20	425.00	\$85.00
12/09/2020	JEO	CO	prepare order on second omnibus claim objection for submission to court	0.60	925.00	\$555.00
12/09/2020	JEO	CO	Finalize BRG stipulation and order for submission to court	0.50	925.00	\$462.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/09/2020	JAM	CO	Revision draft scheduling for SE Multifamily claim litigation (0.1); e-mails with Z. Annable, L. Drawhorn, G. Demo, H. Winograd re: draft scheduling for SE Multifamily claim litigation (0.2); e-mails with E. Weinberger, D. Stroik, G. Demo re: confidential information (0.2).	0.50	1075.00	\$537.50
12/09/2020	EAW	CO	Coordinate with Z. Annable to upload revised summary judgment order; and emails to/from T. Mascherin re: same.	0.10	825.00	\$82.50
12/10/2020	JEO	CO	Email to BRG to confirm filing of stipulation settling claim	0.20	925.00	\$185.00
12/10/2020	JEO	CO	Review entered order approving BRG claim stipulation and forward to BRG	0.20	925.00	\$185.00
12/10/2020	JMF	CO	Review claims stipulations re BRG and 2nd omnibus.	0.30	925.00	\$277.50
12/10/2020	EAW	CO	Assemble research re: claim amendments; and emails to/from J. Fried re: same.	0.60	825.00	\$495.00
12/14/2020	GVD	CO	Conference with J. Bain re CLO claim	0.20	825.00	\$165.00
12/15/2020	HDH	CO	Analyze IFA claim documents	1.40	950.00	\$1,330.00
12/15/2020	IDK	CO	Telephone conference with G Glazer re need for review of analysis re HCMLP note to Acis transferred to Highland Cap Management and related background (.1); E-mails with G Glazer re prior correspondence, memos re same, including brief review of same (.3); E-mails with G Glazer re his initial memo on new issues re same and summary of new related documents (.2); Telephone conferences with G Glazer re same and next steps (.4); Review of G Glazer's list of questions to J Kim re same (.1).	1.10	1145.00	\$1,259.50
12/15/2020	IDK	CO	E-mail to IFA counsels re status on disputes, and potential refiling of claim objection, including review of prior stipulation/correspondence (.3); E-mails with H Hochman re same (.2); E-mail to S Ellington re same (.1).	0.60	1145.00	\$687.00
12/15/2020	IDK	CO	E-mails with G Demo re CEO inquiry on IFA claim status and HCLOM claim, and status on same.	0.20	1145.00	\$229.00
12/15/2020	JEO	CO	Review Stinson claim and email to Isaac Leventon re amount of claim	0.40	925.00	\$370.00
12/15/2020	GIG	CO	Call with Ira D. Kharasch re HCLOM note	0.20	895.00	\$179.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/15/2020	GIG	CO	Review HCLOM note	0.30	895.00	\$268.50
12/15/2020	GIG	CO	Review note assignment	0.60	895.00	\$537.00
12/15/2020	GIG	CO	Review purchase agreement	1.20	895.00	\$1,074.00
12/15/2020	GIG	CO	Review emails and memo re HCLOM note	1.40	895.00	\$1,253.00
12/15/2020	GIG	CO	Consider potential defenses to HCLOM note, prepare excerpts	1.80	895.00	\$1,611.00
12/15/2020	GIG	CO	Call with Ira D. Kharasch re HCLOM note defenses	0.40	895.00	\$358.00
12/15/2020	GIG	CO	Consider and prepare issues list re HCLOM note issues	0.80	895.00	\$716.00
12/15/2020	GIG	CO	Prepare email to J. Kim re HCLOM note issues	0.20	895.00	\$179.00
12/15/2020	GVD	CO	Conference with CLO issuers re CLO claim	0.60	825.00	\$495.00
12/15/2020	GVD	CO	Conference re corporate issues re potential settlement	0.30	825.00	\$247.50
12/16/2020	IDK	CO	E-mails with IFA counsels re their draft response to prior claim objection, including brief review of same (.4); E-mails with H Hochman re same (.1); E-mails with CEO re IFA status and need for S Ellington feedback re same, including CEO correspondence with Ellington (.2).	0.70	1145.00	\$801.50
12/16/2020	RJF	CO	Review Latham correspondence regarding UBS claims.	0.20	1245.00	\$249.00
12/16/2020	RJF	CO	Telephone conference with Jeffrey N. Pomerantz regarding UBS claims.	0.10	1245.00	\$124.50
12/16/2020	GIG	CO	Prepare memo re HCLOM note defenses	5.70	895.00	\$5,101.50
12/16/2020	GIG	CO	Emails with Ira D. Kharasch re HCLOM note, proofs of claim	0.10	895.00	\$89.50
12/16/2020	GIG	CO	Research re material breach and excuse of performance	0.70	895.00	\$626.50
12/16/2020	GIG	CO	Research re setoff and recoupment rights	0.60	895.00	\$537.00
12/16/2020	GIG	CO	Review claim register	0.20	895.00	\$179.00
12/16/2020	GIG	CO	Emails with J. Kim re HCLOM note issues	0.50	895.00	\$447.50
12/16/2020	GVD	CO	Attend to issues re resolution of HarbourVest claim	0.20	825.00	\$165.00
12/17/2020	HDH	CO	Review IFA response and analyze issues regarding claim	1.30	950.00	\$1,235.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/17/2020	HDH	CO	Draft memo to Ira D. Kharasch regarding IFA claim	0.40	950.00	\$380.00
12/17/2020	IDK	CO	Initial review and consider G Gabriel prelim memo on HCLOM note issues for potential defenses (.3); E-mail to G Demo re his feedback on answers to questions on same (.1).	0.40	1145.00	\$458.00
12/17/2020	IDK	CO	Telephone conference with G Demo and J Pomerantz re CLO Holdco issues.	0.20	1145.00	\$229.00
12/17/2020	IDK	CO	E-mail to H Hochman re his views on IFA's draft response and next steps, and consider same.	0.20	1145.00	\$229.00
12/17/2020	IDK	CO	Telephone conference with J. Pomerantz and G Demo re further CLO Holdco issues.	0.20	1145.00	\$229.00
12/17/2020	JNP	CO	Conference with M. Clemente regarding CLO Holdco (2x).	0.20	1075.00	\$215.00
12/17/2020	JNP	CO	Conference with Ira D. Kharasch and Gregory V. Demo regarding CLO Holdco issues.	0.20	1075.00	\$215.00
12/17/2020	JNP	CO	Conference with J. Dubel regarding CLO Holdco issues.	0.20	1075.00	\$215.00
12/17/2020	JNP	CO	Conference with John A. Morris regarding CLO Holdco issues.	0.20	1075.00	\$215.00
12/17/2020	JNP	CO	Conference with Gregory V. Demo regarding CLO Holdco issues.	0.10	1075.00	\$107.50
12/17/2020	JNP	CO	Conference with Gregory V. Demo regarding CLO Holdco issues.	0.20	1075.00	\$215.00
12/17/2020	JNP	CO	Conference with Ira D. Kharasch and Gregory V. Demo regarding CLO Holdco.	0.20	1075.00	\$215.00
12/17/2020	JNP	CO	Conference with Gregory V. Demo regarding status of CLO Holdco issues and related matters.	0.20	1075.00	\$215.00
12/17/2020	JNP	CO	Email to and from M. Clemente regarding CLO Holdco.	0.10	1075.00	\$107.50
12/17/2020	RJF	CO	Telephone conference with Jeffrey N. Pomerantz regarding mediation of UBS claim, UBS letters.	0.30	1245.00	\$373.50
12/17/2020	GIG	CO	Emails with Gregory V. Demo re HCLOM note issues	0.10	895.00	\$89.50
12/17/2020	GIG	CO	Emails with Gregory V. Demo re claim schedules	0.20	895.00	\$179.00
12/17/2020	GVD	CO	Conference with J. Rovira re Hunton claim	0.20	825.00	\$165.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/17/2020	GVD	CO	Multiple correspondences with G. Glazer re lending agreement and next steps	0.30	825.00	\$247.50
12/17/2020	GVD	CO	Correspondence re status of Dugaboy proofs of claim	0.10	825.00	\$82.50
12/17/2020	GVD	CO	Conference with B. Shaw re Acis claim objection	0.20	825.00	\$165.00
12/18/2020	IDK	CO	Attend conference call with some attendance by Wilmer Hale and others on HarbourVest transfer issues and latest Dondero interference (.5).	0.50	1145.00	\$572.50
12/18/2020	IDK	CO	E-mails with J Kim and G Glazer re rescheduling of call re HCLOM.	0.10	1145.00	\$114.50
12/18/2020	JNP	CO	Conference with Gregory V. Demo regarding call with Harbourvest.	0.10	1075.00	\$107.50
12/18/2020	JNP	CO	Conference with Debevoise, PSZJ and T. Silva regarding claim settlement.	0.50	1075.00	\$537.50
12/18/2020	JNP	CO	Conference with T. Silva, John A. Morris, Gregory V. Demo, and Ira D. Kharasch regarding resolution of Harbourvest claims.	0.50	1075.00	\$537.50
12/18/2020	RJF	CO	Telephone conferences with Jeffrey N. Pomerantz regarding UBS status.	0.30	1245.00	\$373.50
12/18/2020	JMF	CO	Review Travers claims and issues relating to 2008 audit.	0.80	925.00	\$740.00
12/18/2020	JAM	CO	Telephone conference with J. Pomerantz, G. Demo, counsel for HarbourVest re: resolution of HarbourVest claim (0.4); telephone conference with J. Pomerantz, G. Demo, T. Silva re: follow-up concerning potential settlement with HarbourVest (0.5).	0.90	1075.00	\$967.50
12/18/2020	GVD	CO	Conference with Debevoise re potential settlement	0.50	825.00	\$412.50
12/18/2020	GVD	CO	Conference with T. Silva re governance issues re potential settlement	0.30	825.00	\$247.50
12/18/2020	GVD	CO	Conference with J. Pomerantz and WilmerHale re potential settlement issues	0.20	825.00	\$165.00
12/18/2020	GVD	CO	Attend to issues re resolution of Hunton claim	0.30	825.00	\$247.50
12/19/2020	RJF	CO	Work on responses to UBS letter to Multi-Strat.	0.50	1245.00	\$622.50
12/19/2020	GVD	CO	Conference with J. Morris re resolution of claim objections	0.20	825.00	\$165.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/19/2020	GVD	CO	Multiple conferences with J. Pomerantz re open items re resolution of claims	0.20	825.00	\$165.00
12/19/2020	GVD	CO	Conference with J. Seery re open items re resolution of claims	0.20	825.00	\$165.00
12/20/2020	JAM	CO	Telephone conference with H. Winograd re: Rule 9019 motion for HarbourVest (0.1).	0.10	1075.00	\$107.50
12/20/2020	GVD	CO	Review and revise proposed scheduling order for Dugaboy claim objections	0.30	825.00	\$247.50
12/20/2020	GVD	CO	Review precedent for potential claims resolution	0.20	825.00	\$165.00
12/20/2020	GVD	CO	Draft stipulation resolving outstanding claim	0.70	825.00	\$577.50
12/21/2020	IDK	CO	Attend conference call with G Glazer, others on HCLOM p-note and open questions (.7); E-mail G Glazer on his list of questions for client legal team, and consider same (.2); E-mails CEO re background for same for authority (.2); E-mails with DSI, J Pomerantz, G Demo on whether to amend schedules re HCLOM claim (.1).	1.20	1145.00	\$1,374.00
12/21/2020	IDK	CO	E-mails with J Elkin re need for research on HCLOM note issues (.1); E-mails with J Elkin and G Glazer re same, nature of issues, and preliminary issues (.3); E-mail to J Kim re DSI newly found documents re HCLOM note, including new forbearance documents, and consider same (.2); E-mails with G Glazer re same and next steps (.1).	0.70	1145.00	\$801.50
12/21/2020	IDK	CO	E-mails with attorneys re G Demo draft of HarbourVest settlement agreement, as well as J Pomerantz edits, and draft motion to approve same, including review and consideration of same and other changes needed.	0.40	1145.00	\$458.00
12/21/2020	IDK	CO	E-mails with Redeemer counsels, others on UBS correspondence re interlocutory appeal question.	0.20	1145.00	\$229.00
12/21/2020	IDK	CO	Telephone conference with J. Pomerantz re potential UBS settlement issues, logistics on same (.1); E-mails to J. Pomerantz and G Demo re same on MS capital structure (.1).	0.20	1145.00	\$229.00
12/21/2020	JNP	CO	Review draft Harbourvest Settlement Agreement (two versions).	0.60	1075.00	\$645.00
12/21/2020	JNP	CO	Review draft 9019 for Harbourvest settlement.	0.10	1075.00	\$107.50
12/21/2020	JNP	CO	Conference with John A. Morris regarding	0.10	1075.00	\$107.50

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Harbourvest 9019.						
12/21/2020	JAM	CO	Review/revise Rule 9019 motion for HarbourVest settlement (2.7); review draft settlement agreement with HarbourVest (0.2); telephone conference with J. Pomerantz re: draft Rule 9019 motion for HarbourVest settlement (0.1).	3.00	1075.00	\$3,225.00
12/21/2020	GIG	CO	Call with Ira D. Kharasch, G. Demo, J. Kim re HCLOM note obligation	0.70	895.00	\$626.50
12/21/2020	GIG	CO	Review memo and prior correspondence re open issues	0.50	895.00	\$447.50
12/21/2020	GIG	CO	Prepare email to Ira D. Kharasch re questions for company	0.10	895.00	\$89.50
12/21/2020	GIG	CO	Emails re forbearance agreements, review same	0.40	895.00	\$358.00
12/21/2020	GIG	CO	Research re breach of related agreements, excuse of performance	1.40	895.00	\$1,253.00
12/21/2020	GIG	CO	Multiple emails with J. Elkin re research re breach of related agreements	0.50	895.00	\$447.50
12/21/2020	GIG	CO	Review Acis settlement agreement and release	0.30	895.00	\$268.50
12/21/2020	GIG	CO	Prepare and revise memo re Acis claim, HCLOM note	1.30	895.00	\$1,163.50
12/21/2020	GVD	CO	Draft settlement with claim resolution	1.80	825.00	\$1,485.00
12/21/2020	GVD	CO	Revise draft settlement agreement re comments from J. Pomerantz	0.90	825.00	\$742.50
12/21/2020	GVD	CO	Preparation conference with J. Pomerantz re call with foreign directors (0.1); conference with foreign directors (0.7)	0.80	825.00	\$660.00
12/21/2020	GVD	CO	Attend to issues re Hunton stipulation	0.40	825.00	\$330.00
12/21/2020	GVD	CO	Conference with CLO issuers counsel re resolution of claims	0.10	825.00	\$82.50
12/21/2020	GVD	CO	Review draft 9019 re settlement	0.40	825.00	\$330.00
12/22/2020	IDK	CO	E-mails with attorneys re upcoming Redeemer call and UBS interlocutory appeal question (.1) ; E-mails with Redeemer team re same, as well as its response to UBS on same (.2) ; Review of correspondence with UBS, J. Pomerantz re same, and Board feedback (.1) ; Attend conference call with Redeemer team on case status, mediation status, Dondero/UBS actions, and UBS appeal issues (.5).	0.90	1145.00	\$1,030.50

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12/22/2020	IDK	CO	E-mails with G Demo re CEO feedback on HarbourVest issues and revised HarbourVest settlement agreement, including review of same (.2) ; Review of various E-mails with attorneys re revised HarbourVest agreement and draft motion, including brief review of same (.2) ; Review of correspondence with CEO on HarbourVest status (.1).	0.50	1145.00	\$572.50
12/22/2020	IDK	CO	Review of further correspondence with J Elkin and G Glazer on HCLOM note issues and research status.	0.20	1145.00	\$229.00
12/22/2020	JNP	CO	Review email from M. Maloney and response by Gregory V. Demo regarding Harbourvest.	0.10	1075.00	\$107.50
12/22/2020	JNP	CO	Review revised Harbourvest 9019 motion and email regarding same.	0.10	1075.00	\$107.50
12/22/2020	JEO	CO	Review status of claims and work on resolving claims	1.80	925.00	\$1,665.00
12/22/2020	JAM	CO	Review/revise Rule 9019 motion for HarbourVest (1.3); e-mails to J. Seery, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: revisions to Rule 9019 motion for HarbourVest (0.1).	1.40	1075.00	\$1,505.00
12/22/2020	GIG	CO	Research re excuse of performance	1.20	895.00	\$1,074.00
12/22/2020	GIG	CO	Multiple emails with J. Elkin re excuse of performance research	0.20	895.00	\$179.00
12/22/2020	GVD	CO	Review, revise, and circulate documents re potential claim settlement	0.70	825.00	\$577.50
12/23/2020	IDK	CO	E-mails with G Glazer on HCLOM status (.1).	0.10	1145.00	\$114.50
12/23/2020	IDK	CO	Review of correspondence with HarbourVest, G Demo on need for their feedback on settlement docs (.1); Brief review of both HarbourVest markup of same along with Wilmer Hale feedback on same (.2); Review briefly our revised settlement re same, as well as numerous E-mails from HarbourVest counsel and Wilmer & Hale re various legal issues re transfer agreement in settlement agreement (.3).	0.60	1145.00	\$687.00
12/23/2020	JNP	CO	Review Debevoise markup of Settlement Agreement with Harbourvest.	0.10	1075.00	\$107.50
12/23/2020	JNP	CO	Conference with Gregory V. Demo and H. Winograd regarding Harbourvest changes to Settlement Agreement.	0.40	1075.00	\$430.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/23/2020	JNP	CO	Conference with Debevoise, Wilmer Hale, Gregory V. Demo and H. Winograd regarding Harbourvest settlement documents.	0.60	1075.00	\$645.00
12/23/2020	GIG	CO	Review summary of research from J. Elkin re excuse of performance, emails re same	0.30	895.00	\$268.50
12/23/2020	GIG	CO	Emails with Ira D. Kharasch re HCLOM note inquiry	0.10	895.00	\$89.50
12/23/2020	GVD	CO	Attend to issues re HarbourVest settlement agreement	4.60	825.00	\$3,795.00
12/23/2020	GVD	CO	Draft settlement agreement re resolution of convertible note purchase agreement	0.10	825.00	\$82.50
12/24/2020	IDK	CO	Review briefly numerous correspondence HarbourVest counsel, Wilmer Hale, CEO, G Demo, re HarbourVest finalization of docs, logistics re same on HCLOF, as well as with CEO on same and need for execution.	0.30	1145.00	\$343.50
12/24/2020	JNP	CO	Review email from Debevoise regarding releases; Conference with Gregory V. Demo regarding same.	0.10	1075.00	\$107.50
12/24/2020	JNP	CO	Conference with M. Maloney and Gregory V. Demo regarding Harbourvest settlement and related issues.	0.50	1075.00	\$537.50
12/24/2020	JNP	CO	Conference with Gregory V. Demo regarding Harbourvest Order and review emails regarding same.	0.10	1075.00	\$107.50
12/24/2020	GVD	CO	Revise and file settlement agreement re HarbourVest	1.20	825.00	\$990.00
12/24/2020	GVD	CO	Conference with J. Pomerantz and M. Maloney re HarbourVest settlement	0.50	825.00	\$412.50
12/27/2020	JAM	CO	Review documents and draft definitions and document requests relating to Hunter Mountain Investment Trust claim objection (1.5); review documents and draft definitions and document requests for HCRE Partners, LLC (0.8).	2.30	1075.00	\$2,472.50
12/28/2020	IDK	CO	E-mails with I. Leventon re initial set of questions on HCLOP p-note potential defense issues, including his responses (.4); E-mails with G. Glazer re same, and need for clarifications, and draft of same (.2); Further correspondence with I. Leventon re same and further clarifications (.3).	0.90	1145.00	\$1,030.50
12/28/2020	IDK	CO	E-mails with attorneys re new settlement offer from Daugherty and issues re same.	0.20	1145.00	\$229.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/28/2020	GVD	CO	Review draft stipulation from CLO issuers counsel	0.20	825.00	\$165.00
12/29/2020	JEO	CO	work on resolving Stinson claim objection	0.60	925.00	\$555.00
12/29/2020	JEO	CO	Review status of claims	1.20	925.00	\$1,110.00
12/29/2020	GVD	CO	Conference with issuers counsel re claim resolution	0.90	825.00	\$742.50
12/29/2020	GVD	CO	Conference with Kathman re claims issues	0.10	825.00	\$82.50
12/29/2020	GVD	CO	Conference with J. Pomerantz re CLO issuers agreement	0.10	825.00	\$82.50
12/30/2020	JNP	CO	Review email from M. Maloney regarding Harbourvest settlement.	0.10	1075.00	\$107.50
12/30/2020	JNP	CO	Review of letter from employee's counsel regarding claims.	0.20	1075.00	\$215.00
12/30/2020	JNP	CO	Conference with J. Dubel regarding letter from employee's counsel.	0.20	1075.00	\$215.00
12/30/2020	JNP	CO	Email to Board regarding letter from employee counsel.	0.10	1075.00	\$107.50
12/30/2020	KKY	CO	Draft stipulation and order resolving Stinson POC 166	0.60	425.00	\$255.00
12/30/2020	GVD	CO	Revise and circulate stipulation re resolution of CLO claims	1.10	825.00	\$907.50
12/31/2020	GVD	CO	Revise and circulate insert to confirmation order resolving issuers claims	0.70	825.00	\$577.50
12/31/2020	GVD	CO	Multiple conferences re potential revisions to HarbourVest settlement agreement	0.70	825.00	\$577.50
				132.60		\$122,978.50

Compensation Prof. [B160]

12/01/2020	JMF	CP	Draft 2nd interim fee application.	1.00	925.00	\$925.00
12/01/2020	EAW	CP	Draft insert for fee application re: summary judgment motions.	1.30	825.00	\$1,072.50
12/02/2020	JNP	CP	Review November bill.	0.50	1075.00	\$537.50
12/03/2020	PJJ	CP	Draft November fee statement.	1.50	425.00	\$637.50
12/03/2020	JMF	CP	Review PSZJ November statement.	0.50	925.00	\$462.50
12/04/2020	JMF	CP	Draft November PSZJ statement.	2.20	925.00	\$2,035.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/06/2020	JNP	CP	Review November fee statement.	0.10	1075.00	\$107.50
12/07/2020	JNP	CP	Email to Board regarding November 2020 fee statement.	0.10	1075.00	\$107.50
12/07/2020	PJJ	CP	Revise November fee statement.	0.30	425.00	\$127.50
12/07/2020	JMF	CP	Finalize PSZJ application.	0.40	925.00	\$370.00
12/08/2020	JNP	CP	Conference with Joshua M. Fried regarding quarterly fee application.	0.10	1075.00	\$107.50
12/08/2020	PJJ	CP	Prepare and file November Fee Statement.	0.20	425.00	\$85.00
12/08/2020	PJJ	CP	Draft 3rd interim fee application.	5.80	425.00	\$2,465.00
12/08/2020	PJJ	CP	Prepare notice of filing corrected Exhibit A to 13th monthly fee statement.	0.50	425.00	\$212.50
12/08/2020	JMF	CP	Telephone calls with P. Jeffries and J.N. Pomerantz re fee statement filing.	0.20	925.00	\$185.00
12/09/2020	JNP	CP	Review and comment on quarterly fee application.	0.20	1075.00	\$215.00
12/09/2020	PJJ	CP	Work on final fee application.	2.30	425.00	\$977.50
12/09/2020	JMF	CP	Draft third fee interim fee application.	5.20	925.00	\$4,810.00
12/10/2020	JNP	CP	Review revisions to fee application.	0.10	1075.00	\$107.50
12/10/2020	JMF	CP	Draft PSZJ interim fee application.	2.70	925.00	\$2,497.50
12/10/2020	GVD	CP	Revise fee application	0.30	825.00	\$247.50
12/11/2020	PJJ	CP	File 3rd interim fee application.	0.20	425.00	\$85.00
12/11/2020	JMF	CP	Finalize fee application (3.1); telephone calls with J.N. Pomerantz (.2) re same.	3.30	925.00	\$3,052.50
12/11/2020	GVD	CP	Review and revise PSZJ fee application	0.20	825.00	\$165.00
12/14/2020	JMF	CP	Review retention application, order and fee guidelines.	0.30	925.00	\$277.50
12/16/2020	KKY	CP	Draft (.1), file (.1), and prepare for filing (.1) certification of no objection re 13th fee app of PSZJ for October 2020	0.30	425.00	\$127.50
12/16/2020	KKY	CP	Review and revise fee chart	0.10	425.00	\$42.50
12/16/2020	JMF	CP	Review CNO and emails re filing of same re PSZJ October statement.	0.20	925.00	\$185.00
12/30/2020	KKY	CP	Draft certification of no objection re 14th fee app of	0.10	425.00	\$42.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
PSZJ for November 2020				30.20		\$22,270.00
Comp. of Prof./Others						
12/01/2020	PJJ	CPO	Prepare omnibus notice of hearing on 3rd interim fee applications.	0.50	425.00	\$212.50
12/02/2020	GVD	CPO	Correspondence with H. O'Neill re compensation	0.20	825.00	\$165.00
12/03/2020	KKY	CPO	Serve (.1) and prepare for service (.1) DSI staffing report for October 2020	0.20	425.00	\$85.00
12/03/2020	KKY	CPO	Draft (.1) and prepare for filing (.1) certificate of service for DSI staffing report for October 2020	0.20	425.00	\$85.00
12/03/2020	GVD	CPO	Review DSI invoice re confidentiality issues and correspondence re same	0.70	825.00	\$577.50
12/04/2020	GVD	CPO	Conference with F. Caruso re payment of OCP expenses	0.30	825.00	\$247.50
12/07/2020	GVD	CPO	Review Hayward invoice for privilege issues	0.30	825.00	\$247.50
12/08/2020	KKY	CPO	Review and revise fee chart	0.20	425.00	\$85.00
12/08/2020	JEO	CPO	Review Deloitte fee application and allocation issues	0.30	925.00	\$277.50
12/08/2020	JMF	CPO	Review Carey correspondences and documents re ordinary course professional payments.	0.30	925.00	\$277.50
12/09/2020	KKY	CPO	Draft (.1) and prepare for filing (.1) notice re OCP report (October 2020)	0.20	425.00	\$85.00
12/09/2020	PJJ	CPO	Revise omnibus fee notice.	0.20	425.00	\$85.00
12/09/2020	JEO	CPO	Email to DSI re OCP Report	0.10	925.00	\$92.50
12/09/2020	GVD	CPO	Conference with E. Bromagen re OCP issues	0.30	825.00	\$247.50
12/10/2020	JEO	CPO	Email with James Romey re OCP issues	0.40	925.00	\$370.00
12/10/2020	GVD	CPO	Review DLA Piper invoices	0.30	825.00	\$247.50
12/11/2020	PJJ	CPO	Revise omnibus fee notice.	0.20	425.00	\$85.00
12/11/2020	JMF	CPO	Review Wilmer application (.3); review omnibus notice and edits to same (.2).	0.50	925.00	\$462.50
12/15/2020	JEO	CPO	Finalize and file October OCP report	0.40	925.00	\$370.00
12/15/2020	JMF	CPO	Review ordinary course professional statement.	0.20	925.00	\$185.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/17/2020	JMF	CPO	Review fee guidelines re interim applications.	0.30	925.00	\$277.50
12/22/2020	JEO	CPO	Review questions from Bar Sharp on OCP issues	0.40	925.00	\$370.00
12/30/2020	KKY	CPO	Review and revise fee chart	0.30	425.00	\$127.50
				7.00		\$5,265.00

Employee Benefit/Pension-B220

12/01/2020	IDK	EB	Numerous E-mails with attorneys re CEO desire to pay bonuses to employees involved in transition pre-Effective Date and issues/logistics re same.	0.30	1145.00	\$343.50
12/01/2020	JNP	EB	Emails regarding employee bonuses.	0.10	1075.00	\$107.50
12/02/2020	IDK	EB	E-mail to G Demo on Ellington, other employment agreements.	0.10	1145.00	\$114.50
12/03/2020	IDK	EB	Telephone conference with J. Pomerantz re issues on employee threats on claims vs estate and next steps (.2); E-mail and telephone conference with K Dine re same (.2); E-mails and telephone conference with G Demo re employee threats on claims and need for research and review of docs (.3); E-mails to J Fried re same and need for call (.1).	0.80	1145.00	\$916.00
12/03/2020	JNP	EB	Conference with Ira D. Kharasch regarding review and analysis of employee related issues.	0.20	1075.00	\$215.00
12/03/2020	JNP	EB	Review Ellington Employment Agreement.	0.20	1075.00	\$215.00
12/04/2020	JMF	EB	Telephone call with I. Kharasch re employee claims issues (.3) review claims and background documents re same (1.4)	1.70	925.00	\$1,572.50
12/07/2020	IDK	EB	Attend conference call with DSI, others on new project re senior employee potential claim allegations, and need for memo re same (.5); E-mail to DSI re relevant information for same (.1); E-mails with J Fried re his questions on prior bonus motions, related issues on same and other bonus program in ordinary course, including feedback from J. Pomerantz (.3).	0.90	1145.00	\$1,030.50
12/07/2020	JNP	EB	Conference with PSZJ and DSI regarding employment policies and claims issues.	0.50	1075.00	\$537.50
12/07/2020	JNP	EB	Emails with Ira D. Kharasch and Joshua M. Fried regarding employee bonus issues.	0.10	1075.00	\$107.50
12/07/2020	JEO	EB	Review PBGC request for information and	0.30	925.00	\$277.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			acknowledge			
12/07/2020	JEO	EB	Email with Scott Austin re PBGC request	0.20	925.00	\$185.00
12/07/2020	JEO	EB	Email to Brian Collins at Highland re PBGC information request	0.20	925.00	\$185.00
12/07/2020	JMF	EB	Telephone call with K. Dine, J.N. Pomerantz, I. Kharasch, G. Demo, J. Romey, J. Donahue re employee claims issues (.5); review plan documents re same (1.2); telephone with K. Dine re research issues (.7).	2.40	925.00	\$2,220.00
12/07/2020	GVD	EB	Conference with team re employee claims issues (0.5); follow up conference with J. Romey re employee claims (0.2)	0.70	825.00	\$577.50
12/07/2020	KBD	EB	Call with Pachulski Stang Ziehl and Jones LLP and DSI regarding employee matters.	0.50	1075.00	\$537.50
12/07/2020	KBD	EB	Call with Joshua Fried regarding employment issues for review.	0.60	1075.00	\$645.00
12/07/2020	KBD	EB	Review employment agreement and related documents.	0.60	1075.00	\$645.00
12/08/2020	IDK	EB	Review of correspondence DSI re significant documents re employee new claim issues (.1); E-mail to J Fried re his follow up re same issue on relief given by court on 1st day wage motion with respect to bonuses (.1).	0.20	1145.00	\$229.00
12/08/2020	JMF	EB	Review employee and background documents re employee claims.	2.70	925.00	\$2,497.50
12/08/2020	KBD	EB	Review information and documents relating to employee bonus programs.	1.30	1075.00	\$1,397.50
12/08/2020	KBD	EB	Review employment agreements with key executives.	0.30	1075.00	\$322.50
12/08/2020	KBD	EB	Draft memorandum regarding employee issues.	0.50	1075.00	\$537.50
12/09/2020	KBD	EB	Review and comment on materials relating to employee benefits.	2.20	1075.00	\$2,365.00
12/10/2020	JMF	EB	Review employee wage and bonus motions and memorandum re same (2.2); telephone call with K. Dine re additional research (.7).	2.90	925.00	\$2,682.50
12/10/2020	KBD	EB	Review materials relating to Highland employee benefits.	1.30	1075.00	\$1,397.50

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12/10/2020	KBD	EB	Telephone call with Joshua Fried regarding employee issues.	0.70	1075.00	\$752.50
12/11/2020	IDK	EB	E-mails with J Fried re employee bonus issues (.2).	0.20	1145.00	\$229.00
12/11/2020	JNP	EB	Review and respond to emails regarding employee gift certificates.	0.10	1075.00	\$107.50
12/11/2020	JMF	EB	Review background employee plans.	0.60	925.00	\$555.00
12/11/2020	JMF	EB	Review wage order and motion and analyze issues re payment of employee benefits.	0.40	925.00	\$370.00
12/11/2020	KBD	EB	Review information relating to employee benefits.	1.60	1075.00	\$1,720.00
12/11/2020	KBD	EB	Draft correspondence regarding needed information.	0.10	1075.00	\$107.50
12/12/2020	KBD	EB	Prepare memorandum regarding employee benefits matters.	2.00	1075.00	\$2,150.00
12/13/2020	IDK	EB	E-mail to G Demo on CEO communications on employee's retention of counsel re claims.	0.10	1145.00	\$114.50
12/13/2020	KBD	EB	Review documents regarding employee benefits matters.	1.50	1075.00	\$1,612.50
12/14/2020	JMF	EB	Review responses and status re pending employee documents.	0.40	925.00	\$370.00
12/14/2020	JMF	EB	Review memo and employment documents re claims.	2.30	925.00	\$2,127.50
12/14/2020	KBD	EB	Prepare memorandum regarding employee benefits.	2.60	1075.00	\$2,795.00
12/15/2020	JMF	EB	Review and comment re employee memorandum (1.7); telephone call with K. Dine re same (.8); research issues re employee claims and amendments of claims (2.4).	4.90	925.00	\$4,532.50
12/15/2020	GVD	EB	Conference with J. Romey re employee issues	0.20	825.00	\$165.00
12/15/2020	KBD	EB	Telephone call with Joshua Fried regarding employee benefits matter.	0.90	1075.00	\$967.50
12/15/2020	KBD	EB	Revisions to memorandum relating to employee benefits.	2.80	1075.00	\$3,010.00
12/16/2020	JMF	EB	Review draft analysis re employee claims issues.	0.80	925.00	\$740.00
12/16/2020	KBD	EB	Revisions to memorandum.	1.60	1075.00	\$1,720.00
12/17/2020	IDK	EB	E-mails with J Fried re labor lawyer status for employee claims analysis (.1); E-mails with	0.20	1145.00	\$229.00

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			attorneys re same and employee questions (.1).			
12/17/2020	JMF	EB	Telephone call with K. Dine re employee claims (.6); legal research re claims allowance issues (2.0).	2.60	925.00	\$2,405.00
12/17/2020	KBD	EB	Telephone call with Joshua Fried regarding employee matters.	0.40	1075.00	\$430.00
12/17/2020	KBD	EB	Revisions to memorandum on employee issues.	0.30	1075.00	\$322.50
12/18/2020	JNP	EB	Review revised stipulation with employees.	0.10	1075.00	\$107.50
12/18/2020	JMF	EB	Telephone call with K. Dine and A. Stauber re employee claims (.5) review Wilmer analysis re same (.7)	1.20	925.00	\$1,110.00
12/18/2020	KBD	EB	Call with Joshua Fried and labor counsel regarding employee issues.	0.40	1075.00	\$430.00
12/18/2020	KBD	EB	Draft correspondence relating to employee benefit issues.	0.20	1075.00	\$215.00
12/18/2020	KBD	EB	Review analysis regarding employee benefit issues.	0.20	1075.00	\$215.00
12/21/2020	JMF	EB	Draft memorandum re employee claims.	4.60	925.00	\$4,255.00
12/22/2020	JNP	EB	Conference with Gregory V. Demo regarding call with D. Neier regarding employee stipulation.	0.10	1075.00	\$107.50
12/22/2020	JMF	EB	Research re employee proofs of claims.	2.80	925.00	\$2,590.00
12/22/2020	JMF	EB	Review memo and K. Dine comments re same.	0.50	925.00	\$462.50
12/22/2020	KBD	EB	Review and prepare comments to memorandum.	1.20	1075.00	\$1,290.00
12/22/2020	KBD	EB	Research regarding legal issue relating to employee benefits.	0.40	1075.00	\$430.00
12/23/2020	JMF	EB	Review memorandum re employee claims and outstanding issues.	1.70	925.00	\$1,572.50
12/23/2020	KBD	EB	Research regarding legal issue with respect to employment benefits.	0.50	1075.00	\$537.50
12/23/2020	KBD	EB	Revisions to memorandum.	0.20	1075.00	\$215.00
12/24/2020	KBD	EB	Research regarding employee benefit issue.	1.60	1075.00	\$1,720.00
12/24/2020	KBD	EB	Revisions to memorandum regarding employee benefit issues.	0.40	1075.00	\$430.00
12/28/2020	JEO	EB	Review response to PBGC inquiry and forward to Hunton for review	0.30	925.00	\$277.50

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				Hours	Rate	Amount
12/28/2020	JEO	EB	Email to PBGC re response to inquiry	0.20	925.00	\$185.00
12/28/2020	JMF	EB	Draft memorandum re employee claims.	1.30	925.00	\$1,202.50
12/29/2020	JMF	EB	Review memo (.8) and email to K. Dine re open questions on same.	0.80	925.00	\$740.00
12/29/2020	KBD	EB	Review questions regarding bonus plans.	0.30	1075.00	\$322.50
12/29/2020	KBD	EB	Revise memorandum regarding employee benefits.	0.20	1075.00	\$215.00
12/30/2020	JNP	EB	Review and respond to email regarding proposed retention program.	0.10	1075.00	\$107.50
12/30/2020	JMF	EB	Draft memorandum re employee claims (2.3) telephone call with K. Dine re same (.3).	2.60	925.00	\$2,405.00
12/30/2020	KBD	EB	Telephone call with Joshua Fried regarding revising memorandum on employee benefit issues.	0.30	1075.00	\$322.50
12/30/2020	KBD	EB	Review and revise employee benefit memorandum.	0.30	1075.00	\$322.50
12/30/2020	KBD	EB	Review correspondence from counsel to employees.	0.20	1075.00	\$215.00
12/31/2020	JMF	EB	Research re employee bonus claims and review memo re same.	1.60	925.00	\$1,480.00
12/31/2020	JMF	EB	Analyze issues re post confirmation labor services and call with Wilmer.	0.60	925.00	\$555.00
				74.00		\$73,431.00

Executory Contracts [B185]

12/02/2020	IDK	EC	E-mails with G Demo re UCC response on assuming lease, as well as with CEO and with local counsel re process for same.	0.20	1145.00	\$229.00
12/04/2020	IDK	EC	Review of correspondence with local re communications with landlord (.1).	0.10	1145.00	\$114.50
12/10/2020	IDK	EC	Review of correspondence with local counsel re landlord, lease assumption update.	0.10	1145.00	\$114.50
12/18/2020	GVD	EC	Conference with DSI and I. Kharasch re contract assumption issues	1.30	825.00	\$1,072.50
12/22/2020	IDK	EC	Review of correspondence attorneys re landlord demand for motion to assume vs schedules of assumed contracts and related concerns.	0.10	1145.00	\$114.50
12/22/2020	JMF	EC	Review motion to assume lease and comments to same.	0.40	925.00	\$370.00

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				Hours	Rate	Amount
12/22/2020	GVD	EC	Conference with landlords counsel re lease assumption	0.20	825.00	\$165.00
12/22/2020	GVD	EC	Review and revise motion to assume lease	0.60	825.00	\$495.00
12/23/2020	JNP	EC	Review and respond to emails regarding assumption of office lease.	0.10	1075.00	\$107.50
12/23/2020	JEO	EC	Email to Greg Demo re 365 deadline	0.20	925.00	\$185.00
12/23/2020	JEO	EC	Review proposed cure notice	0.30	925.00	\$277.50
12/23/2020	JMF	EC	Review revised documents and analyze issues re lease assumption and internal emails re same.	1.10	925.00	\$1,017.50
12/23/2020	GVD	EC	Correspondence re executory contracts	0.10	825.00	\$82.50
12/23/2020	GVD	EC	Attend to issues re filing of lease assumption motion	0.60	825.00	\$495.00
12/28/2020	JMF	EC	Telephone call with G. Demo re notices of assumed contracts; (.1) review plan and plan supplement re same (.4).	0.50	925.00	\$462.50
12/29/2020	JNP	EC	Conference with Gregory V. Demo regarding CLO assumption.	0.10	1075.00	\$107.50
12/29/2020	JMF	EC	Review contract spreadsheet re cure schedules.	0.40	925.00	\$370.00
12/30/2020	KKY	EC	Prepare service list re assumed contracts	1.10	425.00	\$467.50
12/30/2020	JEO	EC	Finalize Cure Notice for Assumed Contracts and coordinate filing and service	1.20	925.00	\$1,110.00
12/31/2020	JNP	EC	Conference with Gregory V. Demo regarding settlement with CLO issuers.	0.20	1075.00	\$215.00
12/31/2020	JEO	EC	Arrange for supplemental service of cure notice on additional party.	0.50	925.00	\$462.50
				9.40		\$8,035.00

Financial Filings [B110]

12/01/2020	JEO	FF	Email to DSI re OCP and Monthly Operating reports	0.10	925.00	\$92.50
12/01/2020	JEO	FF	Review monthly operating report and arrange for filing.	0.30	925.00	\$277.50
				0.40		\$370.00

General Business Advice [B410]

11/24/2020	IAWN	GB	Review demo email re insuring vehicles for	2.30	1025.00	\$2,357.50
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			investment (.1), review file re status of insurance and pending renewal/change in control (1.8), exchange emails and telephone conference with Caruso (.2), send email with explanation for change of control development in policy (.1)			
12/01/2020	JNP	GB	Conference with J. Dubel regarding pending matters.	0.20	1075.00	\$215.00
12/02/2020	IDK	GB	E-mails with attorneys re HCMFA financial statements roadblock.	0.10	1145.00	\$114.50
12/02/2020	IDK	GB	E-mails with Board, others re scheduling Board call this week.	0.10	1145.00	\$114.50
12/02/2020	JNP	GB	Conference with J. Dubel regarding claims and other related issues including Plan issues.	0.30	1075.00	\$322.50
12/03/2020	IDK	GB	Telephone conferences with J. Pomerantz re Dondero further threat of today and next steps and need to call Flynn (.2); E-mails to Lynn and J. Pomerantz re status and need for call (.1); Telephone conference with M Lynn and J. Pomerantz re same (.2); E-mail to attorneys re need for call re same (.1); Attend conference call with J Morris, G Demo, J. Pomerantz re same, draft letter to Dondero (.5); Telephone conference with J. Pomerantz and R. Pachulski re same and next steps re Dondero threats and Lynn conversation re same (.2).	1.30	1145.00	\$1,488.50
12/03/2020	JNP	GB	Conference with J. Dubel regarding variety of Plan related issues.	0.70	1075.00	\$752.50
12/03/2020	JAM	GB	Telephone conference with J. Seery re: demand notes, HarbourVest, Daugherty, Dondero and related matters (0.4); e-mail to Board re: Dondero threats (0.1).	0.50	1075.00	\$537.50
12/04/2020	IDK	GB	E-mails to G Demo, others on draft agenda for Board call today and consider (.2); Attend Board call on open issues and next steps (2.0); E-mails to M Lynn and J. Pomerantz re Lynn's request for call (.1); Telephone conferences with M Lynn and J. Pomerantz re Dondero threat (.2); E-mails to CEO and Flynn re no intention to sell Trussway soon (.2).	2.70	1145.00	\$3,091.50
12/04/2020	IDK	GB	E-mails to CEO, others on draft press release and considerations re same, including revisions by J. Pomerantz to same.	0.20	1145.00	\$229.00
12/04/2020	JNP	GB	Board call.	2.10	1075.00	\$2,257.50
12/04/2020	JNP	GB	Conference with J. Dubel after Board call.	0.20	1075.00	\$215.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/04/2020	JNP	GB	Conference with Gregory V. Demo after Board call.	0.10	1075.00	\$107.50
12/04/2020	JNP	GB	Reach out to M. Lynne before Board Call.	0.10	1075.00	\$107.50
12/04/2020	JNP	GB	Conference with J. Dubel regarding miscellaneous issues.	0.20	1075.00	\$215.00
12/04/2020	JNP	GB	Review press release and emails regarding same.	0.20	1075.00	\$215.00
12/04/2020	RJF	GB	Attend portion of board of directors meeting.	0.60	1245.00	\$747.00
12/04/2020	JAM	GB	Telephone conference Board, J. Pomerantz, I. Kharasch, G. Demo, DSI, R. Feinstein (partial participation) (2.1).	2.10	1075.00	\$2,257.50
12/04/2020	GVD	GB	Draft board agenda (0.4); attend board meeting (2.1); attend all employee update call (0.3)	2.80	825.00	\$2,310.00
12/07/2020	IDK	GB	E-mails re status of press release and CEO decision re same.	0.10	1145.00	\$114.50
12/07/2020	GVD	GB	Review and revise draft press release	0.30	825.00	\$247.50
12/09/2020	JNP	GB	Conference with J. Dubel regarding UBS and other case issues.	0.20	1075.00	\$215.00
12/15/2020	IDK	GB	E-mail to G Demo, DSI on lockdown of data re discovery problems (.1); E-mails with Board re need for call on same (.1); Attend Board call re status, problems on UCC discovery re employees (.8); Telephone conference with J. Pomerantz re his communication with Sidley re same and resolution of today's fire drill on discovery (.1); E-mail to J Morris re same, including review of correspondence with employees re production and willingness to cooperate (.2).	1.30	1145.00	\$1,488.50
12/15/2020	JNP	GB	Board call regarding pending litigation and employee issues (partial).	0.70	1075.00	\$752.50
12/15/2020	JNP	GB	Conference with John A. Morris and J. Dubel regarding employee issues.	0.60	1075.00	\$645.00
12/15/2020	GVD	GB	Attend board meeting	0.80	825.00	\$660.00
12/16/2020	IDK	GB	Telephone conferences with J. Pomerantz re general case issues (.2).	0.20	1145.00	\$229.00
12/16/2020	JNP	GB	Email to Board regarding scheduling call.	0.10	1075.00	\$107.50
12/17/2020	IDK	GB	E-mails with Board re rescheduling of Board meeting (.1); E-mails with Board, J. Pomerantz re scheduling of call with M Lynn on Dondero (.1);	0.30	1145.00	\$343.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			E-mails with J. Pomerantz re his correspondence with Lynn re same (.1).			
12/18/2020	IDK	GB	Numerous E-mails with Board whether to have Board meeting today and outstanding issues (.2).	0.20	1145.00	\$229.00
12/22/2020	IDK	GB	E-mails with Board, others re delaying Board call (.1) ; Attend part of Board call re case issues, Dondero (.5).	0.60	1145.00	\$687.00
12/22/2020	IDK	GB	E-mail with G Demo re result of Acis final decree hearing.	0.10	1145.00	\$114.50
12/22/2020	JAM	GB	Telephone conference with Board, J. Pomerantz, I. Kharasch, G. Demo re: governance issues, creditor issues (1.1).	1.10	1075.00	\$1,182.50
12/22/2020	GVD	GB	Attend board call re litigation and case strategy	1.20	825.00	\$990.00
12/23/2020	IDK	GB	E-mails with Board re reschedule of call today (.1); Attend initial Board call on open issues, MS, UBS, other (.2); Attend 2d Board call re same (.8); Telephone conference with J. Pomerantz re same and R Feinstein's letter re UBS and need for modification (.2).	1.30	1145.00	\$1,488.50
12/23/2020	GVD	GB	Attend board call	1.30	825.00	\$1,072.50
12/29/2020	JNP	GB	Conference with Board, John A. Morris, Robert J. Feinstein, Ira D. Kharasch and Gregory V. Demo regarding various litigation issues.	1.30	1075.00	\$1,397.50
12/29/2020	JAM	GB	Board call with J. Pomerantz, i. Kharasch, R. Feinstein, G. Demo re: litigation matters (1.3).	1.30	1075.00	\$1,397.50
12/29/2020	GVD	GB	Attend board call	1.30	825.00	\$1,072.50
12/31/2020	JNP	GB	Participate on Board call.	1.00	1075.00	\$1,075.00
12/31/2020	JAM	GB	Board call (with J. Pomerantz, I. Kharasch, R. Feinstein, G. Demo) re: various litigation and strategic matters (1.1).	1.10	1075.00	\$1,182.50
12/31/2020	GVD	GB	Attend board meeting	1.10	825.00	\$907.50
				34.30		\$35,254.50

General Creditors Comm. [B150]

12/01/2020	IDK	GC	Attend conference call with UCC members and their professionals on status (.6).	0.60	1145.00	\$687.00
12/01/2020	JNP	GC	Participate on Board and Committee call.	0.50	1075.00	\$537.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/01/2020	GVD	GC	Prepare for board/committee meeting (0.1); attend board/committee meeting (0.7)	0.80	825.00	\$660.00
12/07/2020	IDK	GC	E-mail to Board, others re tomorrow meeting with UCC.	0.10	1145.00	\$114.50
12/08/2020	IDK	GC	E-mails with attorneys re upcoming UCC call today and cancellation considerations.	0.10	1145.00	\$114.50
12/14/2020	IDK	GC	E-mails with Board re UCC request to cancel tomorrow call and reschedule possibilities.	0.20	1145.00	\$229.00
12/16/2020	IDK	GC	E-mails with Board, others re UCC request for call later this week.	0.10	1145.00	\$114.50
12/17/2020	IDK	GC	E-mails with Board, others on coordination of call with UCC tomorrow (.1).	0.10	1145.00	\$114.50
12/17/2020	GVD	GC	Conference with E. Bromagen re open items and next steps	0.20	825.00	\$165.00
12/18/2020	IDK	GC	Attend conference call with UCC members, their professionals, Board, others re case status (.7).	0.70	1145.00	\$801.50
12/18/2020	JNP	GC	Participate on Board and Committee call.	0.80	1075.00	\$860.00
12/18/2020	GVD	GC	Attend board/committee meeting	0.80	825.00	\$660.00
12/21/2020	IDK	GC	E-mails with Board, others on cancellation of tomorrow's UCC call (.1).	0.10	1145.00	\$114.50
12/22/2020	JNP	GC	Conference with M. Clemente regarding various outstanding issues.	0.50	1075.00	\$537.50
12/28/2020	GVD	GC	Conference with E. Bromagen re open issues	0.50	825.00	\$412.50
12/30/2020	GVD	GC	Correspondence with E. Bromagen re status of plan documents	0.20	825.00	\$165.00
				6.30		\$6,287.50

Mediation

12/02/2020	IDK	M	E-mails with CEO and J. Pomerantz re upcoming call with mediators and status on need for further mediation (.2); Attend conference call with mediators on status and next steps in mediation (.8).	1.00	1145.00	\$1,145.00
12/02/2020	JNP	M	Conference with Ira D. Kharasch, Gregory V. Demo and mediators regarding status.	0.80	1075.00	\$860.00
12/02/2020	JNP	M	Conference with J. Dubel regarding call with mediators.	0.20	1075.00	\$215.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/02/2020	JNP	M	Conference with J. Seery regarding call with mediators and other issues.	0.70	1075.00	\$752.50
12/02/2020	GVD	M	Attend call with mediators (partial)	0.40	825.00	\$330.00
12/07/2020	RJF	M	Prepare for mediators' call. Mediation	0.30	1245.00	\$373.50
12/08/2020	IDK	M	Office conference with J. Pomerantz re upcoming call with mediators (.1); Attend conference call with mediators (.8); Telephone conference with J. Pomerantz re result of call (.1); Telephone conference with J. Pomerantz re result of call with Dubel re same (.1); Review of correspondence with mediators re next steps for further mediation (.1).	1.20	1145.00	\$1,374.00
12/08/2020	JNP	M	Conference with Ira D. Kharasch regarding call with mediators (before and after).	0.20	1075.00	\$215.00
12/08/2020	JNP	M	Conference with Robert J. Feinstein regarding call with mediators.	0.10	1075.00	\$107.50
12/08/2020	JNP	M	Conference with J. Dubel regarding call with mediators (2x).	0.50	1075.00	\$537.50
12/08/2020	JNP	M	Conference with mediators, Ira D. Kharasch, Gregory V. Demo and Robert J. Feinstein.	0.80	1075.00	\$860.00
12/08/2020	JNP	M	Email to mediators regarding call with J. Dubel.	0.10	1075.00	\$107.50
12/08/2020	RJF	M	Prepare for call with mediators. Mediation	0.30	1245.00	\$373.50
12/08/2020	RJF	M	Call with mediators regarding UBS claim. Mediation	0.80	1245.00	\$996.00
12/08/2020	RJF	M	Telephone conference with Jeffrey N. Pomerantz post-mediators call. Mediation	0.20	1245.00	\$249.00
12/08/2020	EAW	M	Emails to/from PSZJ team re: HFP and UBS mediation. Mediation	0.20	825.00	\$165.00
12/08/2020	GVD	M	Attend call with mediators	0.80	825.00	\$660.00
12/09/2020	IDK	M	E-mails with Board, others on correspondence with mediators on terms of restarting mediation on UBS.	0.10	1145.00	\$114.50
12/09/2020	EAW	M	Review email from J. Dubel re: mediation (UBS). Mediation	0.10	825.00	\$82.50
12/11/2020	IDK	M	Telephone conference with J. Pomerantz re mediation/UBS issues and Board feedback and questions re same (.2); E-mails with Board, G Demo re mediation and scheduling (.1).	0.30	1145.00	\$343.50
12/11/2020	JNP	M	Conference with Ira D. Kharasch regarding	0.20	1075.00	\$215.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			mediation with UBS.			
12/14/2020	IDK	M	Telephone conference with J. Pomerantz re mediation issues (.1); Review of correspondence with mediators and Board on upcoming mediation (.1).	0.20	1145.00	\$229.00
12/16/2020	IDK	M	Review of correspondence from mediators (.1); E-mails with Board, others re same, and need for call tomorrow on debrief on mediation (.1).	0.20	1145.00	\$229.00
12/17/2020	IDK	M	E-mails with attorneys re upcoming info on mediator's proposal (.1); Telephone conference with J. Pomerantz re mediation (.1).	0.20	1145.00	\$229.00
12/17/2020	JNP	M	Conference with J. Dubel regarding mediation (several).	0.90	1075.00	\$967.50
12/17/2020	JNP	M	Conference with Robert J. Feinstein regarding UBS mediation.	0.10	1075.00	\$107.50
12/17/2020	JNP	M	Email to Elissa A. Wagner regarding mediation.	0.10	1075.00	\$107.50
12/17/2020	JNP	M	Conference with Ira D. Kharasch regarding mediation.	0.10	1075.00	\$107.50
12/18/2020	IDK	M	Telephone conference with J. Pomerantz re status of mediation with UBS (.1).	0.10	1145.00	\$114.50
12/18/2020	JNP	M	Conference with J. Dubel regarding UBS mediation.	0.10	1075.00	\$107.50
12/18/2020	JNP	M	Conference with Ira D. Kharasch regarding UBS mediation.	0.10	1075.00	\$107.50
12/18/2020	JNP	M	Conference with Robert J. Feinstein regarding UBS mediation.	0.10	1075.00	\$107.50
12/19/2020	JNP	M	Conference with J. Dubel regarding UBS mediation and related issues.	0.60	1075.00	\$645.00
12/19/2020	JNP	M	Conference with Ira D. Kharasch regarding UBS mediation.	0.20	1075.00	\$215.00
12/19/2020	JNP	M	Conference with Gregory V. Demo regarding UBS mediation.	0.10	1075.00	\$107.50
12/21/2020	IDK	M	E-mail to and telephone conference with J. Pomerantz re communication from mediators on status and their proposal (.1).	0.10	1145.00	\$114.50
12/21/2020	JNP	M	Conference with J. Dubel regarding mediation and other related issues.	0.40	1075.00	\$430.00
12/28/2020	JNP	M	Review email from S. Mayer regarding status.	0.10	1075.00	\$107.50

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				13.00		\$14,110.00
Plan & Disclosure Stmt. [B320]						
11/03/2020	RMP	PD	Conferences with I. Kharasch re litigation issues and plan of reorganization.	0.40	1445.00	\$578.00
11/17/2020	RMP	PD	Conference with I. Kharasch re plan issues.	0.40	1445.00	\$578.00
11/24/2020	RMP	PD	Conference with I. Kharasch re plan status.	0.30	1445.00	\$433.50
12/01/2020	RMP	PD	Conferences with I. Kharasch and telephone conference with J. Pomerantz re plan issues.	0.40	1445.00	\$578.00
12/01/2020	JEO	PD	Emails with KCC to follow up on solicitation	0.90	925.00	\$832.50
12/01/2020	JMF	PD	Analyze issues re claims and plan impairment of classes.	0.80	925.00	\$740.00
12/01/2020	GVD	PD	Conference with J. Seery re employee issues	0.20	825.00	\$165.00
12/02/2020	RMP	PD	Conference with I. Kharasch re plan issues.	0.40	1445.00	\$578.00
12/02/2020	JMF	PD	Review voting procedures and order re solicitation mailing confirmation.	0.60	925.00	\$555.00
12/02/2020	GVD	PD	Revise and circulate litigation trust agreement (0.7); conference with employees re release issues (1.8); follow up conference with J. Seery re release issues (0.2); correspondence re confirmation hearing (0.1)	2.80	825.00	\$2,310.00
12/03/2020	IDK	PD	Review of numerous correspondence with G Demo and Delaware counsel re potential Delaware trustees for statutory trust, including responses from potential trustees and terms of conditions and services.	0.20	1145.00	\$229.00
12/03/2020	GVD	PD	Correspondence re retention of Delaware trustee	0.20	825.00	\$165.00
12/04/2020	IDK	PD	Review and consider Dondero new potential plan summary and values (.2); Telephone conference with J. Pomerantz re Dondero latest on potential plan and related issues (.1); Review of Dondero clarification of his revised potential plan (.1).	0.40	1145.00	\$458.00
12/04/2020	JMF	PD	Review injunction provisions re plan	0.40	925.00	\$370.00
12/07/2020	IDK	PD	E-mails with G Demo and J. Pomerantz re correspondence with UCC counsel today on our proposed amendment to plan release provision, and Sidley feedback.	0.20	1145.00	\$229.00
12/07/2020	JNP	PD	Review email from Sidley regarding response to request to amend release provisions.	0.10	1075.00	\$107.50

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12/07/2020	GVD	PD	Revise and circulate claimant trust agreement (0.6); correspondence with Sidley re release issue (0.2)	0.80	825.00	\$660.00
12/08/2020	JEO	PD	Review claim transfers and convenience class status	0.40	925.00	\$370.00
12/09/2020	JNP	PD	Email to and from J. Dubel regarding rate of interest in solvent case.	0.10	1075.00	\$107.50
12/09/2020	JNP	PD	KCC email regarding transferred claims.	0.10	1075.00	\$107.50
12/09/2020	JEO	PD	Review status of transfer claims	0.80	925.00	\$740.00
12/09/2020	JEO	PD	Respond to IRS request for ballot	0.20	925.00	\$185.00
12/10/2020	IDK	PD	E-mails with attorneys re communications with Sidley on open plan issues, including retention of professionals post-Effective Date.	0.20	1145.00	\$229.00
12/10/2020	JNP	PD	Review of claims voting report.	0.10	1075.00	\$107.50
12/10/2020	JMF	PD	Review voting summary.	0.30	925.00	\$277.50
12/10/2020	GVD	PD	Conference with E. Bromagen and A. Russell re plan issues	0.30	825.00	\$247.50
12/10/2020	GVD	PD	Conference with D. Neier re senior employee stipulation	0.30	825.00	\$247.50
12/11/2020	IDK	PD	E-mails with Redeemer team re their request for call re Dondero plan (.1); Attend conference call with Redeemer team on Dondero communications on debtor's plan and Dondero potential plan (.5).	0.60	1145.00	\$687.00
12/11/2020	JNP	PD	Conference with Jenner and Ira D. Kharasch regarding Plan issues.	0.50	1075.00	\$537.50
12/11/2020	JNP	PD	Conference with J. Dubel regarding Plan issues and related matters (2x).	0.50	1075.00	\$537.50
12/11/2020	JEO	PD	Emails regarding solicitation package for claim no. 81 filed by Alvarez & Marsal	0.60	925.00	\$555.00
12/13/2020	IDK	PD	E-mail to G Demo re draft proposal to Sidley re plan and handling of employee disputed claims.	0.10	1145.00	\$114.50
12/13/2020	GVD	PD	Draft counterproposal to Committee re open plan issues	0.20	825.00	\$165.00
12/16/2020	JNP	PD	Review attest claims balloting report.	0.10	1075.00	\$107.50
12/16/2020	JEO	PD	Finalize Third Removal Extension Motion and coordinate filing and service with local counsel	0.80	925.00	\$740.00

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12/16/2020	JMF	PD	Draft confirmation brief.	1.50	925.00	\$1,387.50
12/16/2020	JMF	PD	Review PBGC language re confirmation order.	0.30	925.00	\$277.50
12/16/2020	JMF	PD	Review voting classification re claims.	0.40	925.00	\$370.00
12/16/2020	JMF	PD	Review draft confirmation order re brief.	0.80	925.00	\$740.00
12/17/2020	JNP	PD	Email to Board regarding call with M. Lynne.	0.10	1075.00	\$107.50
12/17/2020	JNP	PD	Email to M. Lynne regarding call with Board.	0.10	1075.00	\$107.50
12/17/2020	JMF	PD	Draft confirmation brief.	3.40	925.00	\$3,145.00
12/17/2020	JMF	PD	Review plan treatment issues re class opt out mechanics.	0.80	925.00	\$740.00
12/17/2020	JMF	PD	Review voting summary and issues re resolved claims after voting deadline.	0.50	925.00	\$462.50
12/17/2020	GVD	PD	Correspondence with P. Leatham re treatment of GUC class	0.20	825.00	\$165.00
12/17/2020	GVD	PD	Review D. Neier proposed revisions to Senior Employee Stipulation	0.40	825.00	\$330.00
12/17/2020	GVD	PD	Review Sidley revisions to claimant trust agreement	0.20	825.00	\$165.00
12/18/2020	IDK	PD	Review of correspondence with UCC counsel and G Demo on plan open issue re employee claim resolution and our proposal.	0.20	1145.00	\$229.00
12/18/2020	IDK	PD	E-mails with J. Pomerantz and G Demo re UCC and Claimant Trust Agreement issues on open issues.	0.20	1145.00	\$229.00
12/18/2020	JNP	PD	Review Committee proposed revisions to Claimant Trust Agreement and Litigation Trust Agreement.	0.10	1075.00	\$107.50
12/18/2020	JMF	PD	Draft confirmation brief.	4.70	925.00	\$4,347.50
12/18/2020	JMF	PD	Review voting report.	0.50	925.00	\$462.50
12/18/2020	GVD	PD	Draft and file plan supplement	2.70	825.00	\$2,227.50
12/20/2020	JNP	PD	Emails regarding transferability of work product privilege as part of claimant Trust Agreement.	0.10	1075.00	\$107.50
12/20/2020	GVD	PD	Correspondence with PSZJ team re privilege issues in trust agreement	0.10	825.00	\$82.50
12/21/2020	IDK	PD	Review and consider Dondero's new potential plan structure sent today (.3); Attend conference call with Dondero counsel, the Board, J. Pomerantz re Dondero's new potential plan concepts (1.1);	1.70	1145.00	\$1,946.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Telephone conferences with J. Pomerantz re same and next steps (.2); E-mails with attorneys re same and whether Klos assistance violates TRO (.1).			
12/21/2020	JNP	PD	Conference with Ira D. Kharasch regarding call with Board and M. Lynn regarding Plan.	0.10	1075.00	\$107.50
12/21/2020	JNP	PD	Review email from M. Lynn enclosing Plan proposal in preparation for call with Board.	0.10	1075.00	\$107.50
12/21/2020	JNP	PD	Email to Board enclosing proposal from M. Lynn.	0.10	1075.00	\$107.50
12/21/2020	JNP	PD	Conference with J. Dubel regarding M. Lynn Plan proposal.	0.10	1075.00	\$107.50
12/21/2020	JNP	PD	Conference with Gregory V. Demo regarding Plan issues.	0.10	1075.00	\$107.50
12/21/2020	JNP	PD	Conference with M. Lynn, Board and Ira D. Kharasch regarding Plan issues.	1.10	1075.00	\$1,182.50
12/21/2020	JNP	PD	Conference with Board after call with M. Lynn regarding Plan issues.	0.50	1075.00	\$537.50
12/21/2020	JNP	PD	Conference with Ira D. Kharasch after call with Board regarding Plan issues and related.	0.20	1075.00	\$215.00
12/21/2020	JNP	PD	Review email from M. Lynn to creditors regarding Plan and forward to Board.	0.10	1075.00	\$107.50
12/21/2020	JMF	PD	Draft confirmation brief.	2.80	925.00	\$2,590.00
12/21/2020	JMF	PD	Review sample plan support agreements.	0.40	925.00	\$370.00
12/21/2020	JMF	PD	Review summary re claims and email P. Leatham re inquiry re same.	0.20	925.00	\$185.00
12/21/2020	GVD	PD	Conference with E. Bromagen re open plan issues	0.40	825.00	\$330.00
12/22/2020	IDK	PD	Review of correspondence with Neier re our plan supplement and Senior Employee Stipulation (.1).	0.10	1145.00	\$114.50
12/22/2020	IDK	PD	Review of correspondence with J Fried on plan assumption issues and related notice issues.	0.10	1145.00	\$114.50
12/22/2020	JMF	PD	Review plan (.5) draft notice re assumed contracts (.5).	1.00	925.00	\$925.00
12/22/2020	JMF	PD	Review plan supplement and contract assumptions.	0.80	925.00	\$740.00
12/22/2020	JMF	PD	Review PBGC data request.	0.40	925.00	\$370.00
12/22/2020	GVD	PD	Conference with counsel to senior employees and follow up re same	0.40	825.00	\$330.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/23/2020	IDK	PD	E-mails with attorneys re UCC counsel concerns on work product issues on Claimant Trust (.1); E-mails with attorneys re logistical issues on assuming lease through separate motion continent on confirmation (.1); E-mails with DSI, G Demo re logistics on cure amounts for assumed contracts and timing (.1).	0.30	1145.00	\$343.50
12/23/2020	JMF	PD	Review and draft confirmation order.	1.50	925.00	\$1,387.50
12/23/2020	JMF	PD	Review ballot tabulations.	0.40	925.00	\$370.00
12/24/2020	IDK	PD	E-mails with CEO, attorneys re Dondero counsel request for discovery on plan confirmation, and issues re providing same and confidentiality issues, including response to Lynn re same.	0.20	1145.00	\$229.00
12/24/2020	JNP	PD	Conference with Gregory V. Demo regarding Plan voting issues.	0.10	1075.00	\$107.50
12/28/2020	IDK	PD	Review of numerous correspondence with CEO, others on assumption of CLO agreements with issuers and cure and logistics re same (.3).	0.30	1145.00	\$343.50
12/28/2020	IDK	PD	Review and consider CEO compensation proposal.	0.20	1145.00	\$229.00
12/28/2020	JMF	PD	Draft voting declaration re Plan Confirmation.	4.50	925.00	\$4,162.50
12/28/2020	JMF	PD	Draft confirmation order.	2.30	925.00	\$2,127.50
12/28/2020	GVD	PD	Conference with J. Fried re notices for assumed contracts	0.20	825.00	\$165.00
12/29/2020	JEO	PD	Review report of plan voting and circulate to PSZJ team	0.40	925.00	\$370.00
12/29/2020	JMF	PD	Draft confirmation order.	3.20	925.00	\$2,960.00
12/29/2020	JMF	PD	Telephone call with J. Donahue re post confirmation transitional issues.	0.30	925.00	\$277.50
12/30/2020	JMF	PD	Draft contract notice and review agreements and related issues re contracts to be assumed under Plan Supplement.	2.80	925.00	\$2,590.00
12/30/2020	JMF	PD	Review plan and supplement re contract assumption.	0.80	925.00	\$740.00
12/31/2020	JNP	PD	Conference with M. Clemente regarding status of Plan and related issues.	0.30	1075.00	\$322.50
12/31/2020	JMF	PD	Review confirmation order.	0.60	925.00	\$555.00
12/31/2020	JMF	PD	Review plan documents and solicitation procedures order and issues re contract assumption.	0.80	925.00	\$740.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/31/2020	JMF	PD	Review voting tabulation spreadsheet.	0.20	925.00	\$185.00
				63.10		\$60,220.50

Ret. of Prof./Other

12/02/2020	JNP	RPO	Conference with Gregory V. Demo regarding retention of CLO counsel	0.10	1075.00	\$107.50
12/02/2020	GVD	RPO	Correspondence with Delaware counsel re retention (0.2); attend to issues re potential retention of special counsel (0.5)	0.70	825.00	\$577.50
12/08/2020	GVD	RPO	Attend to issues re potential retention of CLO counsel	2.90	825.00	\$2,392.50
12/09/2020	GVD	RPO	Conference with Quinn re potential engagement	0.50	825.00	\$412.50
12/09/2020	GVD	RPO	Conference with J. Seery and J. Morris re CLO attorney issues	0.50	825.00	\$412.50
12/09/2020	GVD	RPO	Review Kasowitz engagement letter	0.30	825.00	\$247.50
12/23/2020	JMF	RPO	Review retention order and application.	0.30	925.00	\$277.50
12/23/2020	GVD	RPO	Attend to issues re retention of ordinary course professionals	0.40	825.00	\$330.00
12/28/2020	GVD	RPO	Correspondence re filing of additional disclosures for ordinary course professionals	0.30	825.00	\$247.50
				6.00		\$5,005.00

Stay Litigation [B140]

12/01/2020	IDK	SL	E-mail to J Morris re Daugherty chancery court stipulation and intent to move for stay relief, including review of stipulation, as well as actual motion for stay relief (.3); E-mails with attorneys re same, deadline to object and comparison to prior stay motion (.1).	0.40	1145.00	\$458.00
12/01/2020	JMF	SL	Review Daugherty stay relief motions.	0.40	925.00	\$370.00
12/12/2020	IDK	SL	E-mails with J Morris and J. Pomerantz re draft response to Daugherty stay relief motion, and issues for same.	0.20	1145.00	\$229.00
12/12/2020	JNP	SL	Review draft opposition to Daugherty Relief from Stay motion.	0.10	1075.00	\$107.50
12/13/2020	IDK	SL	E-mail to J Morris re draft of response to Daugherty	0.20	1145.00	\$229.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			motion, including brief review of same.			
12/13/2020	JNP	SL	Review revised version of Relief from Stay motion and emails with John A. Morris regarding same.	0.20	1075.00	\$215.00
12/13/2020	JAM	SL	Review/revise objection to Daugherty lift stay motion (4.1); e-mail to Board, J. Pomerantz, I. Kharasch, G. Demo, H. Winograd re: objection to Daugherty lift stay motion (0.1); draft JAM declaration in support of objection to Daugherty's lift stay motion (0.7); e-mails with J. Pomerantz re: objection to Daugherty's lift stay motion (0.2); review/review objection to Daugherty's lift stay motion (0.3);	5.40	1075.00	\$5,805.00
12/14/2020	JMF	SL	Review Daugherty motion for relief from stay and opposition to stay relief.	0.70	925.00	\$647.50
12/16/2020	IDK	SL	E-mails with attorneys re correspondence with Daugherty counsel re tomorrow's hearing, witness issues (.2).	0.20	1145.00	\$229.00
12/16/2020	JNP	SL	Review email regarding Daugherty Relief from Stay motion.	0.10	1075.00	\$107.50
12/17/2020	IDK	SL	E-mails with attorneys re upcoming hearing on Daugherty motion today (.1); Attend hearing re same (1.1).	1.20	1145.00	\$1,374.00
12/17/2020	JNP	SL	Participate on Daugherty Relief from Stay hearing.	1.50	1075.00	\$1,612.50
12/17/2020	JNP	SL	Conference with Ira D. Kharasch after hearing on Daugherty Relief from Stay motion.	0.10	1075.00	\$107.50
12/17/2020	JNP	SL	Conference with John A. Morris after hearing on Daugherty Relief from Stay motion.	0.10	1075.00	\$107.50
12/18/2020	JMF	SL	Review stay relief order and stipulation re Daugherty.	0.20	925.00	\$185.00
				<u>11.00</u>		<u>\$11,784.00</u>
TOTAL SERVICES FOR THIS MATTER:						\$1,046,024.00

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Expenses

02/03/2020	CC	Conference Call [E105] AT&T Conference Call, RJF	2.69
02/05/2020	CC	Conference Call [E105] AT&T Conference Call, RJF	6.19
03/13/2020	CC	Conference Call [E105] AT&T Conference Call, RJF	12.51
04/03/2020	CC	Conference Call [E105] AT&T Conference Call, RJF	18.68
06/13/2020	CC	Conference Call [E105] AT&T Conference Call, RJF	8.78
10/02/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	41.99
10/02/2020	CC	Conference Call [E105] Loop Up Conference Call, JNP	6.79
10/05/2020	CC	Conference Call [E105] AT&T Conference Call, EAW	9.59
10/05/2020	CC	Conference Call [E105] AT&T Conference Call, EAW	8.28
10/06/2020	CC	Conference Call [E105] Loop Up Conference Call, JNP	20.79
10/07/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	3.61
10/16/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	13.65
10/17/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	3.71
10/19/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	5.83
10/19/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	3.32
10/19/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	0.07
10/19/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	61.53
10/20/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	19.67
10/20/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	11.52
10/20/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	5.69
10/20/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	9.59
10/20/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	35.91
10/20/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	10.08
10/21/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	0.43
10/21/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	8.46
10/21/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	3.01
10/21/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	10.85
10/21/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	51.80
10/21/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	4.93
10/22/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	0.07
10/23/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	12.46
10/23/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	2.87

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10/23/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	4.55
10/23/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	8.68
10/24/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	13.58
10/26/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	12.11
10/27/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	28.77
10/27/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	21.56
10/27/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	12.95
10/29/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	2.95
10/29/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	5.67
10/30/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	1.94
10/30/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	11.62
10/30/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	47.32
11/01/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	7.21
11/02/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	76.96
11/02/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	9.10
11/02/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	3.07
11/02/2020	LN	36027.00002 Lexis Charges for 11-02-20	2.88
11/03/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	10.85
11/03/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	10.85
11/03/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	6.99
11/03/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	0.63
11/03/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	6.37
11/03/2020	LN	36027.00002 Lexis Charges for 11-03-20	36.15
11/03/2020	LN	36027.00002 Lexis Charges for 11-03-20	2.88
11/04/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	12.39
11/04/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	3.21
11/04/2020	LN	36027.00002 Lexis Charges for 11-04-20	48.21
11/04/2020	LN	36027.00002 Lexis Charges for 11-04-20	2.88
11/04/2020	PO	36027.00002 :Postage Charges for 11-04-20	24.00
11/05/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	9.24
11/05/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	4.32
11/05/2020	LN	36027.00002 Lexis Charges for 11-05-20	2.88
11/06/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	0.28
11/06/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	5.88

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11/06/2020	LN	36027.00002 Lexis Charges for 11-06-20	2.88
11/09/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	13.65
11/09/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	11.55
11/09/2020	LN	36027.00002 Lexis Charges for 11-09-20	108.47
11/09/2020	LN	36027.00002 Lexis Charges for 11-09-20	13.40
11/09/2020	LN	36027.00002 Lexis Charges for 11-09-20	2.88
11/09/2020	PO	36027.00002 :Postage Charges for 11-09-20	10.40
11/09/2020	PO	36027.00002 :Postage Charges for 11-09-20	64.00
11/10/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	10.98
11/10/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	163.07
11/10/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	16.03
11/10/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	18.97
11/10/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	28.00
11/10/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	7.49
11/10/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	8.68
11/10/2020	LN	36027.00002 Lexis Charges for 11-10-20	48.21
11/10/2020	LN	36027.00002 Lexis Charges for 11-10-20	2.88
11/10/2020	LN	36027.00002 Lexis Charges for 11-10-20	0.61
11/10/2020	LN	36027.00002 Lexis Charges for 11-10-20	8.66
11/11/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	1.68
11/11/2020	LN	36027.00002 Lexis Charges for 11-11-20	24.10
11/11/2020	LN	36027.00002 Lexis Charges for 11-11-20	2.88
11/12/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	77.49
11/12/2020	CC	Conference Call [E105] AT&T Conference Call, EAW	6.28
11/12/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	2.45
11/12/2020	LN	36027.00002 Lexis Charges for 11-12-20	36.15
11/12/2020	LN	36027.00002 Lexis Charges for 11-12-20	2.88
11/13/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	0.77
11/13/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	3.64
11/13/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	14.77
11/13/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	0.04
11/13/2020	FE	36027.00002 FedEx Charges for 11-13-20	78.66
11/13/2020	LN	36027.00002 Lexis Charges for 11-13-20	0.83

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11/13/2020	LN	36027.00002 Lexis Charges for 11-13-20	12.04
11/13/2020	LN	36027.00002 Lexis Charges for 11-13-20	2.88
11/14/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	5.67
11/14/2020	CC	Conference Call [E105] Loop Up Conference Call, JNP	29.01
11/16/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	3.42
11/16/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	2.85
11/16/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	0.40
11/16/2020	LN	36027.00002 Lexis Charges for 11-16-20	2.88
11/17/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	62.02
11/17/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	28.96
11/17/2020	LN	36027.00002 Lexis Charges for 11-17-20	0.83
11/17/2020	LN	36027.00002 Lexis Charges for 11-17-20	2.88
11/17/2020	LN	36027.00002 Lexis Charges for 11-17-20	0.61
11/17/2020	LN	36027.00002 Lexis Charges for 11-17-20	8.66
11/18/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	2.17
11/18/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	10.78
11/18/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	14.49
11/18/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	2.40
11/18/2020	CC	Conference Call [E105] AT&T Conference Call, EAW	5.62
11/18/2020	LN	36027.00002 Lexis Charges for 11-18-20	2.88
11/19/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	2.66
11/19/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	2.52
11/19/2020	DC	36027.00002 Advita Charges for 11-19-20	7.50
11/19/2020	LN	36027.00002 Lexis Charges for 11-19-20	84.37
11/19/2020	LN	36027.00002 Lexis Charges for 11-19-20	2.88
11/19/2020	LN	36027.00002 Lexis Charges for 11-19-20	8.66
11/20/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	30.31
11/20/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	17.03
11/20/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	0.17
11/20/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	25.42
11/20/2020	LN	36027.00002 Lexis Charges for 11-20-20	2.88
11/21/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	10.92
11/22/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	13.65
11/23/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	4.61

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11/23/2020	CC	Conference Call [E105] AT&T Conference Call, GVD	12.88
11/23/2020	LN	36027.00002 Lexis Charges for 11-23-20	23.32
11/23/2020	LN	36027.00002 Lexis Charges for 11-23-20	2.88
11/24/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	36.96
11/24/2020	LN	36027.00002 Lexis Charges for 11-24-20	2.88
11/25/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	22.82
11/25/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	19.04
11/25/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	10.57
11/25/2020	LN	36027.00002 Lexis Charges for 11-25-20	2.88
11/27/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	4.41
11/27/2020	CC	Conference Call [E105] AT&T Conference Call, JAM	5.44
11/27/2020	LN	36027.00002 Lexis Charges for 11-27-20	2.88
11/29/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	23.22
11/29/2020	CC	Conference Call [E105] Loop Up Conference Call, IDK	10.50
11/30/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	26.45
11/30/2020	CC	Conference Call [E105] Loop Up Conference Call, GVD	5.95
11/30/2020	LN	36027.00002 Lexis Charges for 11-30-20	2.88
11/30/2020	PO	36027.00002 :Postage Charges for 11-30-20	2.60
12/01/2020	RE	(64 @0.10 PER PG)	6.40
12/01/2020	RE	(342 @0.10 PER PG)	34.20
12/01/2020	RE2	SCAN/COPY (330 @0.10 PER PG)	33.00
12/01/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/01/2020	RE2	SCAN/COPY (47 @0.10 PER PG)	4.70
12/01/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/02/2020	RE	(1 @0.10 PER PG)	0.10
12/02/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/02/2020	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
12/02/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/02/2020	RE2	SCAN/COPY (17 @0.10 PER PG)	1.70
12/02/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
12/02/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/02/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/02/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10

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12/02/2020	RE2	SCAN/COPY (9 @0.10 PER PG)	0.90
12/02/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/02/2020	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
12/02/2020	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
12/02/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/02/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/02/2020	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
12/02/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/03/2020	RE	(208 @0.10 PER PG)	20.80
12/03/2020	RE	(1 @0.10 PER PG)	0.10
12/03/2020	RE	(2 @0.10 PER PG)	0.20
12/03/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
12/03/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/03/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/03/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/03/2020	RE2	SCAN/COPY (52 @0.10 PER PG)	5.20
12/03/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
12/03/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/03/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/04/2020	RE	(20 @0.10 PER PG)	2.00
12/04/2020	RE2	SCAN/COPY (25 @0.10 PER PG)	2.50
12/04/2020	RE2	SCAN/COPY (30 @0.10 PER PG)	3.00
12/07/2020	RE	(16 @0.10 PER PG)	1.60
12/07/2020	RE	(2 @0.10 PER PG)	0.20
12/07/2020	RE	(3 @0.10 PER PG)	0.30
12/07/2020	RE	(1 @0.10 PER PG)	0.10
12/07/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
12/07/2020	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
12/07/2020	RE2	SCAN/COPY (44 @0.10 PER PG)	4.40
12/07/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/07/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
12/07/2020	RE2	SCAN/COPY (52 @0.10 PER PG)	5.20
12/07/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/07/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30

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12/08/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
12/08/2020	RE2	SCAN/COPY (5 @0.10 PER PG)	0.50
12/08/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/08/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/09/2020	RE2	SCAN/COPY (47 @0.10 PER PG)	4.70
12/09/2020	RE2	SCAN/COPY (42 @0.10 PER PG)	4.20
12/09/2020	RE2	SCAN/COPY (42 @0.10 PER PG)	4.20
12/09/2020	RE2	SCAN/COPY (26 @0.10 PER PG)	2.60
12/09/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
12/09/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/09/2020	RE2	SCAN/COPY (37 @0.10 PER PG)	3.70
12/09/2020	RE2	SCAN/COPY (7 @0.10 PER PG)	0.70
12/09/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/09/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/09/2020	RE2	SCAN/COPY (102 @0.10 PER PG)	10.20
12/09/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/09/2020	RE2	SCAN/COPY (5 @0.10 PER PG)	0.50
12/09/2020	RE2	SCAN/COPY (21 @0.10 PER PG)	2.10
12/09/2020	RE2	SCAN/COPY (5 @0.10 PER PG)	0.50
12/09/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
12/09/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
12/10/2020	CC	Conference Call [E105] CourtCall Debit Ledger for 12/01/2020 through 12/31/2020, SWG	54.00
12/10/2020	RE	(1 @0.10 PER PG)	0.10
12/10/2020	RE	(7 @0.10 PER PG)	0.70
12/10/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/10/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/11/2020	RE	(22 @0.10 PER PG)	2.20
12/11/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/11/2020	RE2	SCAN/COPY (26 @0.10 PER PG)	2.60
12/14/2020	RE	(1 @0.10 PER PG)	0.10
12/14/2020	RE	(133 @0.10 PER PG)	13.30
12/14/2020	RE	(1 @0.10 PER PG)	0.10
12/14/2020	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50

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12/14/2020	RE2	SCAN/COPY (66 @0.10 PER PG)	6.60
12/14/2020	RE2	SCAN/COPY (44 @0.10 PER PG)	4.40
12/14/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/14/2020	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
12/14/2020	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
12/14/2020	RE2	SCAN/COPY (7 @0.10 PER PG)	0.70
12/14/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/14/2020	RE2	SCAN/COPY (22 @0.10 PER PG)	2.20
12/14/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/14/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/14/2020	RE2	SCAN/COPY (5 @0.10 PER PG)	0.50
12/14/2020	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
12/14/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/14/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
12/14/2020	RE2	SCAN/COPY (266 @0.10 PER PG)	26.60
12/14/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/15/2020	RE	(3 @0.10 PER PG)	0.30
12/15/2020	RE	(1472 @0.10 PER PG)	147.20
12/15/2020	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
12/15/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
12/15/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/15/2020	RE2	SCAN/COPY (30 @0.10 PER PG)	3.00
12/15/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/15/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/15/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/15/2020	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
12/15/2020	RE2	SCAN/COPY (5 @0.10 PER PG)	0.50
12/15/2020	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
12/15/2020	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
12/15/2020	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
12/15/2020	RE2	SCAN/COPY (65 @0.10 PER PG)	6.50
12/15/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/15/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/15/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30

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12/15/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
12/15/2020	RE2	SCAN/COPY (26 @0.10 PER PG)	2.60
12/15/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/15/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/15/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
12/15/2020	RE2	SCAN/COPY (5 @0.10 PER PG)	0.50
12/15/2020	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
12/15/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
12/15/2020	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
12/15/2020	RE2	SCAN/COPY (1210 @0.10 PER PG)	121.00
12/15/2020	RE2	SCAN/COPY (8 @0.10 PER PG)	0.80
12/15/2020	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
12/15/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/15/2020	RE2	SCAN/COPY (333 @0.10 PER PG)	33.30
12/16/2020	CC	Conference Call [E105] CourtCall Debit Ledger for 12/01/2020 through 12/31/2020, SWG	54.00
12/16/2020	RE	(2 @0.10 PER PG)	0.20
12/16/2020	RE	(7 @0.10 PER PG)	0.70
12/16/2020	RE2	SCAN/COPY (17 @0.10 PER PG)	1.70
12/16/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
12/16/2020	RE2	SCAN/COPY (155 @0.10 PER PG)	15.50
12/16/2020	RE2	SCAN/COPY (49 @0.10 PER PG)	4.90
12/16/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/16/2020	RE2	SCAN/COPY (61 @0.10 PER PG)	6.10
12/16/2020	RE2	SCAN/COPY (66 @0.10 PER PG)	6.60
12/16/2020	RE2	SCAN/COPY (246 @0.10 PER PG)	24.60
12/16/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
12/16/2020	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
12/16/2020	RE2	SCAN/COPY (100 @0.10 PER PG)	10.00
12/16/2020	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
12/16/2020	RE2	SCAN/COPY (280 @0.10 PER PG)	28.00
12/16/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/17/2020	RE	(160 @0.10 PER PG)	16.00
12/17/2020	RE	(1227 @0.10 PER PG)	122.70

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12/17/2020	RE	(2 @0.10 PER PG)	0.20
12/17/2020	RE	(145 @0.10 PER PG)	14.50
12/17/2020	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
12/17/2020	RE2	SCAN/COPY (66 @0.10 PER PG)	6.60
12/17/2020	RE2	SCAN/COPY (87 @0.10 PER PG)	8.70
12/17/2020	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
12/17/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/17/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/17/2020	RE2	SCAN/COPY (21 @0.10 PER PG)	2.10
12/17/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/17/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/17/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
12/17/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/17/2020	RE2	SCAN/COPY (28 @0.10 PER PG)	2.80
12/17/2020	RE2	SCAN/COPY (44 @0.10 PER PG)	4.40
12/17/2020	RE2	SCAN/COPY (25 @0.10 PER PG)	2.50
12/17/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/18/2020	RE	(58 @0.10 PER PG)	5.80
12/18/2020	RE	(255 @0.10 PER PG)	25.50
12/18/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/18/2020	RE2	SCAN/COPY (59 @0.10 PER PG)	5.90
12/18/2020	RE2	SCAN/COPY (43 @0.10 PER PG)	4.30
12/18/2020	RE2	SCAN/COPY (57 @0.10 PER PG)	5.70
12/18/2020	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
12/18/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/18/2020	RE2	SCAN/COPY (137 @0.10 PER PG)	13.70
12/18/2020	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
12/18/2020	RE2	SCAN/COPY (28 @0.10 PER PG)	2.80
12/18/2020	RE2	SCAN/COPY (71 @0.10 PER PG)	7.10
12/21/2020	RE	(1 @0.10 PER PG)	0.10
12/21/2020	RE	(5 @0.10 PER PG)	0.50
12/21/2020	RE	(105 @0.10 PER PG)	10.50
12/21/2020	RE	(1 @0.10 PER PG)	0.10
12/21/2020	RE	(38 @0.10 PER PG)	3.80

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12/21/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/21/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/21/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/21/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/21/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/21/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
12/21/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/21/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/21/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (1204 @0.10 PER PG)	120.40
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/21/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/21/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/21/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
12/21/2020	RE2	SCAN/COPY (5 @0.10 PER PG)	0.50
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30

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12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/21/2020	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
12/22/2020	RE	(31 @0.10 PER PG)	3.10
12/22/2020	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
12/23/2020	RE	(18 @0.10 PER PG)	1.80
12/23/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/23/2020	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
12/23/2020	RE2	SCAN/COPY (54 @0.10 PER PG)	5.40
12/23/2020	RE2	SCAN/COPY (54 @0.10 PER PG)	5.40
12/23/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/23/2020	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
12/28/2020	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
12/28/2020	RE2	SCAN/COPY (46 @0.10 PER PG)	4.60
12/29/2020	RE	(61 @0.10 PER PG)	6.10
12/29/2020	RE	(10 @0.10 PER PG)	1.00
12/29/2020	RE	(51 @0.10 PER PG)	5.10
12/29/2020	RE	(13 @0.10 PER PG)	1.30
12/29/2020	RE	(41 @0.10 PER PG)	4.10
12/29/2020	RE2	SCAN/COPY (43 @0.10 PER PG)	4.30
12/29/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
12/29/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
12/29/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/30/2020	RE	(1 @0.10 PER PG)	0.10
12/30/2020	RE	(5 @0.10 PER PG)	0.50
12/30/2020	RE	(17 @0.10 PER PG)	1.70
12/30/2020	RE	(3 @0.10 PER PG)	0.30
12/30/2020	RE	(90 @0.10 PER PG)	9.00
12/30/2020	RE	(1 @0.10 PER PG)	0.10
12/30/2020	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
12/30/2020	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
12/30/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/30/2020	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/30/2020	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
12/30/2020	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40

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12/31/2020	PAC	Pacer - Court Research	527.90
12/31/2020	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
12/31/2020	RE2	SCAN/COPY (9 @0.10 PER PG)	0.90
12/31/2020	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
Total Expenses for this Matter			\$4,130.90

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 12/31/2020

Total Fees \$1,046,024.00

Total Expenses 4,130.90

Total Due on Current Invoice \$1,050,154.90

Outstanding Balance from prior invoices as of 12/31/2020 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
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Total Amount Due on Current and Prior Invoices:	\$1,050,154.90
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